

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGI PORTAL LLC,

Plaintiff,

v.

REDFIN CORPORATION,

Defendant.

C.A. NO. _____

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Digi Portal LLC files this Original Complaint for Patent Infringement against Redfin Corporation, and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Digi Portal LLC (“Digi Portal” or “Plaintiff”) is a Texas limited liability company with a mailing address at 2108 Dallas Parkway, Ste 214-1003, Plano, TX 75093-4362.

2. On information and belief, Defendant Redfin Corporation (“Defendant”) is a corporation organized and existing under the laws of Delaware, with a place of business at 1099 Stewart St, Suite 600, Seattle, WA 98101. Defendant has a registered agent at National Registered Agents, Inc., 160 Greentree Dr Ste 101, Dover, DE 19904.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged

herein. Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware corporation.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware. Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is incorporated in Delaware. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,352,854)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On January 8, 2013, United States Patent No. 8,352,854 ("the '854 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '854 Patent is titled "Dynamic Page Generator." The '854 patent is not subject to a terminal disclaimer and its

term is extended under 35 U.S.C. 154(b) by 1270 days. (Ex. A). A true and correct copy of the ‘854 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Digi Portal is the assignee of all right, title and interest in the ‘854 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘854 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘854 Patent by Defendant.

11. The application leading to the ‘854 patent is a continuation of U.S. application Ser. No. 11/656,636, filed Jan. 22, 2007, which is a continuation of U.S. application Ser. No. 09/393,718, filed Sep. 10, 1999, which is a continuation of U.S. application Ser. No. 08/873,975, filed Jun. 12, 1997. (Ex. A at cover). The ‘854 patent was first assigned to Yahoo! Inc. (*Id.*).

12. The invention in the ‘854 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:26-30).

13. Web servers for serving static web pages were well known in the global Internet. (*Id.* at col. 1:31-32). Such static web pages are useful in many applications whether the information presented to each requesting user is the same. (*Id.* at col. 1:32-34). However, some applications require customization to appeal to users. (*Id.* at col. 1:34-35). One example is presenting news to users. (*Id.* at col. 1:35-37). When static pages are used, a user will often have to scroll through many topics not of interest to that user to get to the information of interest. (*Id.* at col. 1:37-40). However, when presenting news to users, customized web pages present news that is more relevant to the requesting user than static pages because the information is filtered according to each user’s interest. (*Id.* at col. 1:35-37, 40-41).

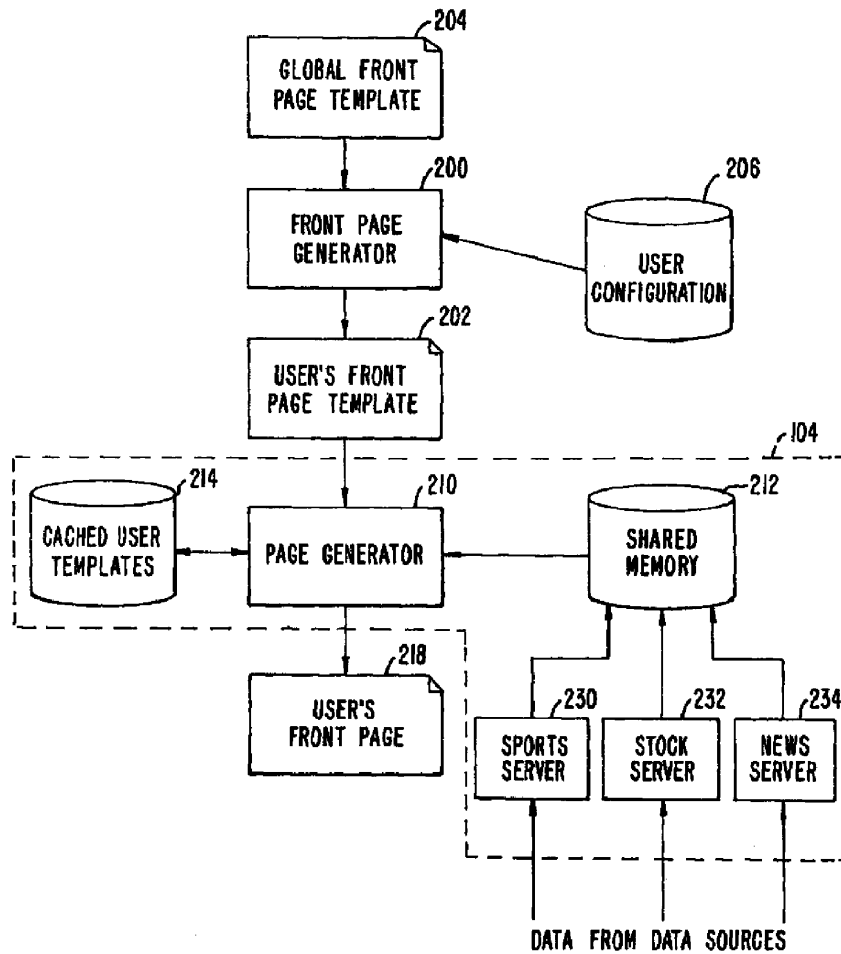
14. Customizing a server response based on the requester is known; however, known systems do not scale well. (*Id.* at col. 1:42-43). One method of serving custom pages is to execute a script, such as a Common Gateway Interface (CGI) script or other program to collect the information necessary to generate the custom page. (*Id.* at col. 1:43-47). For example, if the custom page is a news page containing stock quotes, sports scores and weather, the script might poll a quote server to obtain the quotes of interest, poll a sports score server to obtain the scores of interest and poll a weather server to obtain the weather. (*Id.* at col. 1:47-51). With this information, the server generates the custom page and returns it to the user. (*Id.* at col. 1:51-52). This approach is only useful where there are not many requesters and where the attendant delay associated with polling various servers to obtain the requested information is acceptable to users. (*Id.* at col. 1:53-54). Growing impatience with waiting will turn users away from such servers, especially as use increases. (*Id.* at col. 1:54-58).

15. One approach that was used in the prior art to avoid long waits is to transfer the custom information in non-real-time, so that the information is stored local to the user as it arrives and is presented to the user on request. (*Id.* at col. 1:59-62). A disadvantage of such a system is that the networks used by the user become clogged with data continually streaming to the user and require large amounts of local storage. (*Id.* at col. 1:62-65). Another disadvantage is that the locally stored information will become out of date as the server receives new data. (*Id.* at col. 1:65-67).

16. The inventors therefore recognized that there was a need to dynamically generate customized pages in an unconventional manner that solved the technical problems in the prior art of long transfer times to obtain the requested information or having to rely on continually

transferring custom information in non-real time which can clog the data network in addition to providing outdated information. (*Id.* at col. 1:42 to col. 2:2).

17. The following is a discussion of non-limiting examples of the claimed invention discussed in the specification of the '854 patent. The '854 patent provides a non-limiting exemplary diagram of the generation of a custom page for a user, using a front-page generator (200) and page server (104) (*Id.* at col. 3:58-60):



(Ex. A at Fig. 2). Front page generator (200) generates a user template (202) from a global front page template (204) and a user configuration record (206). (*Id.* at col. 3:58-62). A non-limiting example of a global front page template is provided in the '854 patent:

```

<html>
<head>
<title>My Yahoo! news summary for <!-- login --></title>
</head>
<body>

<center>
<!-- banner:sum -->

<!-- ad -->
<!-- nav bar --> ~ 302
</center>

<table border=1 cellpadding=4 cellspacing=0 width=100%>
<tr><td align=center valign=top width="1%">
<!-- leftside:nsum --> ~ 302
<p></td>
<td align=center valign=top width="100%">
<!-- mode bar:"FRONT PAGE" -->
<!-- channel:nsum --> ~ 302

</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width=100%>
<!-- motd:motn.html -->
</table>
</center>
<!-- search -->

<!-- copyright:sum -->

</body>
</html>

```

204

(Ex. A at Fig. 3). The global user template (204) is an HTML (HyperText Markup Language) document with additional tags as placeholders for live data. (*Id.* at col. 5:16-19). Several placeholders (302) are shown in the code. (*Id.* at col. 5:19).

18. A user configuration record (206) is a record selected from user configuration database (116). (*Id.* at col. 3:63-64). User configuration information includes user demographic information, such as sex, age, location, stock quotes, favorite sports teams, news topics, etc. (*Id.* at col. 2:13-14, col. 5:45-50, col. 6:37-39, 46-48, 52-56). The user configuration information in the example may not change until the user changes his or her preferences. (*Id.* at col. 5:33-35).

19. The '854 patent provides an illustration of a user template (202) as might be generated from global user template (204) and a user configuration record (206):

202

```

    <!-- timezone:-8,PT 0 -->
    <!-- ad:M,85,95035,T,* 792 -->
    <!-- portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
404 { 2836 -->
    <!--
    scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NFLSFO
    ,NLSFO 3803 -->
    <!-- weather:f,30901,uk_londo,94601,95101 4368 -->
    <!--
    mode_bar:"FRONT_PAGE",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/news
    /summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
    <!-- motd:us_motn.html 4696 -->
    <html>
    <head>
    <title>My Yahoo! news summary for ash802</title>
    </head>
    <body>

    ...

    </body>
    </html>

```

(Ex. A at Fig. 4). The user template is unique because it is built based on user demographic information provided by the user, as opposed to generically chosen dynamic information or based on information provided by the server. Exemplary demographic information is shown in line 2 of Fig. 4 (“:M,85,95035,T,*”) indicating that the user is a male, age 85, located in zip code 95035, etc. (*Id.* at col. 5:42-45). The ‘854 patent includes a full listing of the non-limiting exemplary user template of Fig. 4 in Appendix A. (Ex. A at col. 2:57-58; col. 5:22-23).

Listing of a User Template

```

<!-- timezone: -8,PT 0 -->
<!-- ad:M,85,95035,T,* 792 -->
<!--
portfolio:Quotes,pf_1,1, ^DJI, ^NYA, ^IXIC, ^SPX, ^XAX,YHOO,NSCP,IOM,NSCP,YHOO
2836 -->
<!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NF
LSFO,NLSFO 3803 -->
<!-- weather:f,30901,uk_londo,94601,95101 4368 - - >
<!--
mode_bar:"FRONT_PAGE1",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/
news/summary.html?v 4538 -->
<!-- summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
<!-- motd:us__motn.html 4696 -->
<html>
<head>
<title>My Yahoo!news summary for ash802</title>
</head>
<body>

<center>
<map name="top"><area shape=rect coords="0,0,45,66"
href="/news/summary.html?v"><area shape=rect coords="45,0,90,66"
href="/internet/directory.html?v"><area shape=rect coords="90,0,135,66"
href="/contacts/white_pages.html?v"><area shape=rect coords="135,0,346,66"
href="/myHome"><area shape=rect coords="346,0,389,66"
href="/help/news/summary.html"><area shape=rect coords="389,0,431,66"
href="http://edit.my.yahoo.com/config/eval_profile"><area shape=rect
coords="431,0,477,66" href="http://edit.my.yahoo.com/config/toffly">
</map>
<center><a href="/bin/top__menu"></a></center>

<p>
<center><form action="http://search.my.yahoo.com/search/my"> <font
size="-2">[ <a
href="http://edit.my.yahoo.com/config/set_attr?attr=sloc&value=b&.done=htt
p://my.yahoo.com/news/summary.html?v">move to bottom</a> ] </font><input
size=25 name=p> <font size="-1">&nbsp;   <input type=submit
value=Search><input type=hidden name=n value="25"> &nbsp;   <a
href="http://search.my.yahoo.com/search/my/options">Options</a></font></fo
rm></center><p>
<center>
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<tr>
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<td>&nbsp;   &nbsp;  &nbsp;  &nbsp;</td>
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<td>&nbsp;   &nbsp;  &nbsp;  &nbsp;</td>
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href="/news/portfolio_summary.html?v">Portfolios</a></td>
<td>&nbsp;   &nbsp;  &nbsp;  &nbsp;</td>
<td align=center><a
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<td>&nbsp;   &nbsp;  &nbsp;  &nbsp;</td>
<td align=center><a href="/news/sports/summary.html?v">Sports</a></td>
<td>&nbsp;   &nbsp;  &nbsp;  &nbsp;</td>
<td align=center><a
href="/news/technology/summary.html?v">Technology</a></td>
</tr>
</table>
</center>
</center>
<table border=1 cellpadding=4 cellspacing=0 width="100%">
<tr><td align=center valign=top width="1%">
<a
href="http://edit.my.yahoo.com/config/eval_left?mode=left_nsum&.done=http%
3a%2f%2fmy%2eyahoo%2ecom%2fnews%2fsummary%2html%3fv"></a>
<table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=4 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><b><font
size="+1">P<font size="+0">ORTFOLIOS</font></b></td><td

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```
align=right"><a
href="http://edit.my.yahoo.com/config/eval_quotes?.done=http://my.yahoo.co
m/news/summary.html?v"></a></td></tr></table></td></tr>
<tr><td align=center colspan=4><form method=get
action="http://quote.yahoo.com/quotes"><font size="-1"><input type=text
size=10 name=symbols><input type=submit value="Get Quotes"><br><font
size="0">quotes delayed 20 minutes - <a
href="/fin_disclaimer.html">disclaimer</a><br>click on symbol for detailed
quote + news<br><b>*</b> indicates new news during last
24hrs <font></form></td></tr></table>
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<tr bgcolor="#dcdcdc"><td colspan=5 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/sum/?http://sports.yahoo.com/"><b><font size="+1">S<font
size="+0">COREBOARD</font></font></b></a></td><td align=right><a
href="http://edit.my.yaho9.com/config/set_sports?.done=http://my.yahoo.com
/news/summary.html?y"></a></td></tr></table></td></tr>
<tr size=0><table border=0 cellpadding=2 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=3 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/my/?http://weather.yahoo.com/"><b><font size="+1">W<font
size="+0">EATHER</font></font></b></a></td><td align=right><a
href="http://edit.my.yahoo.com/config/set_vni?.done=http://my.yahoo.com/ne
ws/summary.html?v"></a></td></tr></table></td></tr>
<tr><td align=center colspan=3><font size=0>click on city for extended
forecast</font></td></tr>
</table>
<br>
<tr size=0>
<td align=right>
<td align=center valign=top width="100%">
<table border=1 cellpadding=2 cellspacing=0 width="100%">
</table>
</td></tr>
</table>
<center>
<table border=1 cellpadding=2 cellspacing=0 width="100%">
</table>
</center>
<br>
<tr>
<td align=left valign=top><table border=0 cellpadding=0 cellspacing=0>
<tr><td align=left valign=bottom><a href="/my/?http://www.yahoo.com/"></a></td>
<td align=left valign=bottom width="100%"><font size="-1"><i>Copyright
&copy; 1994-1997 Yahoo! Inc. All rights reserved.</i><br>Portions
copyright &copy; 1997 Reuters Ltd. All rights reserved.<br>
Portions copyright &copy; 1997 SportsTicker Enterprises LP. All rights
reserved.<br>
Portions copyright &copy; 1997 Weathernews Inc. All rights reserved.<br>
Portions copyright &copy; 1997 Business Wire. All rights reserved.<br>
Portions copyright &copy; 1997 PR Newswire. All rights reserved.<br>
Questions, comments, or suggestions? Send us <a
href="http://my.yahoo.com/feedback.html">feedback</a></font></td>
</tr>
</table>
</td>
<td align=right><a href="/bin/logout_menu"></a></td>
</tr>
</table>
</center>
<map name=logout>
<area coords="0,0,50,68" href="/my/?http://www.yahoo.com/">
<area coords="51,0,100,68"
href="http://edit.my.yahoo.com/config/login?logout=1">
</map>

</body>
</html>

```

(Ex. B at Col. 7-11).

20. As shown in Fig. 2 of the '854 patent, the user template does not need to be generated each time and instead can be generated and stored. (Ex. A at col. 4:49-51, col. 5:23-32). One benefit of the claimed invention that speeds up the operation of the dynamic page generation is that the page can be stored in multiple locations that are based on the frequency by which the user requests the customized page based on the user template. (*Id.* at col. 5:37-38, col. 6:49-59). Some users might choose to access their user page infrequently, while others might choose to access their front page hourly. (*Id.* at col. 6: 52-54). For infrequent users, the user template is stored in a user configuration database, whereas for frequent users the user template may also be stored in cache. (*Id.* at col. 5:37-38, col. 6:51-59). Caching reduces the time to respond to a request for a page and is more effective where the typical user makes several requests in a short time span and then doesn't make any requests for a long period of time. (*Id.* at col. 5:29-32).

21. When the user template stored in cache, it may be stored long enough to be reused and may also be flushed from cache if the user page has been inactive for several days. (*Id.* at col. 6:49-52, 59-60). Even if it is flushed from cache, the user template can be maintained in the user configuration database, which can then be quickly accessed and stored in cache in the event a user may start to access the user page quickly. (*Id.*).

22. The custom user page can also include an advertisement that is selected based on the user demographic information. (*Id.* at col. 5:39-42). For example, using the demographic information “:M,85,95035,T,*”, an advertisement can be selected that is targeted for a male user, age 85, located in zip code 95035, etc. (*Id.* at col. 5:39-45).

23. Appendix B of the ‘854 patent is an HTML source code listing of an HTML page created from an executed user template that is used to generate a user customized browser web page. (Ex. B at col. 11 – col. 19).

24. As explained the ‘854 patent and prosecution history, there are unconventional and non-generic features of the claimed invention which are technical improvements that make the generation of dynamic web pages quicker, more efficient, and use less resources. By storing the user customized template program in two locations in which the location is determined by frequency, the system is more efficient and allows for a quicker response than the prior art. For example, by storing the user customized template in user configuration database and in cache, the dynamic generation of a user customized web page is more efficient and uses less resources of the server, database, and network, and allows for a quicker generation of the dynamic web page thereby allowing the server to scale in order to handle substantially more requests for user customized dynamic web pages. (*See* Ex. A at col. 1:42-67, col. 4:49-col. 5:15, col. 5:23-32). Furthermore, by caching the user template, the page can be generated entirely within a page server, thus conserving network and database resources. (*See id.* at col. 4:10-11, col. 5:23-32). By also storing the user customized template in a user configuration database, even if the cache is cleared, the template already exists in the database which then prevents having to regenerate a new user customized page from a global page template using a user configuration record thus saving database and server resources and more quickly generating the requested web page from

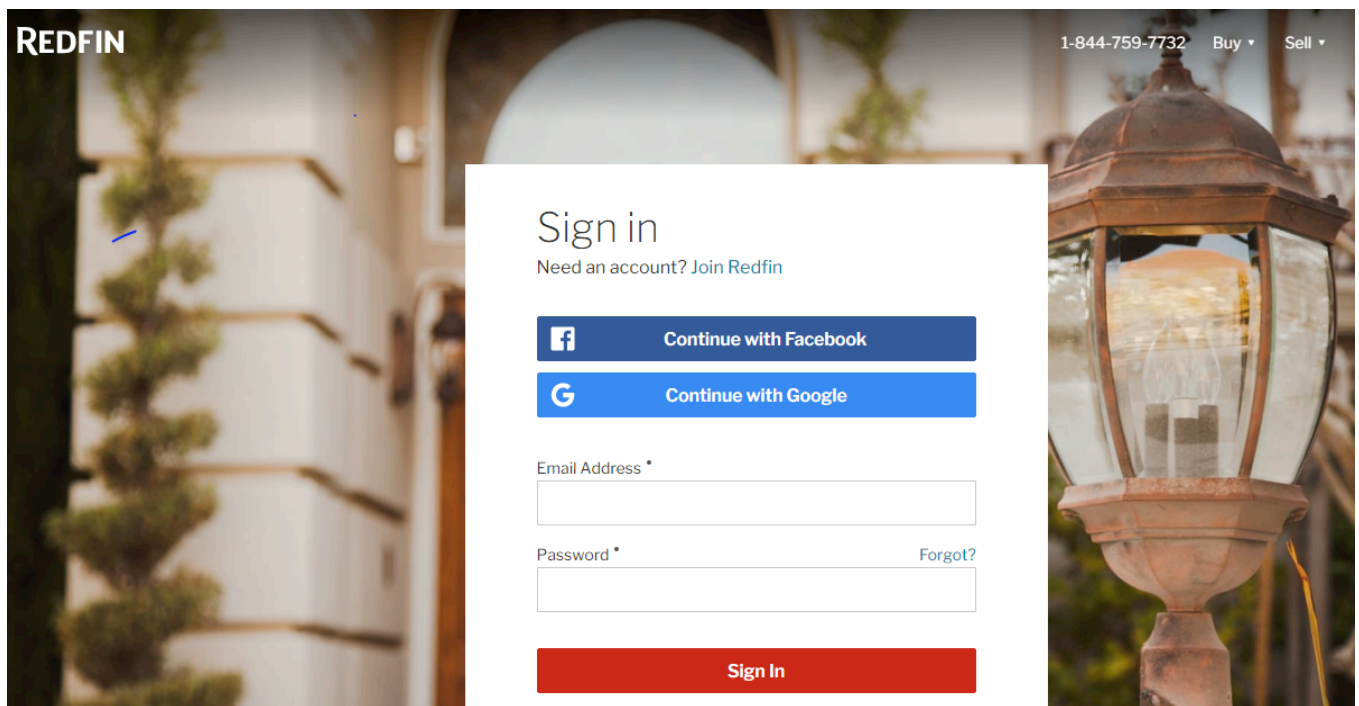
the user customized template. (*E.g.*, *id.* at col. 3:37-39, col. 4:1-11, 49-62). The storage of a user customized template program in at least two locations and the location determined from the frequency of the user request for the customized page was an unconventional and non-generic method for storing such templates and was not disclosed in the prior art. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9).

25. Furthermore, the invention provides for more personalized web pages because the user provides user configuration information on which the user customized template is generated. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9; Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6). This was an unconventional way for generating a user customized template unique to the user that was not found in the prior art. (Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6).

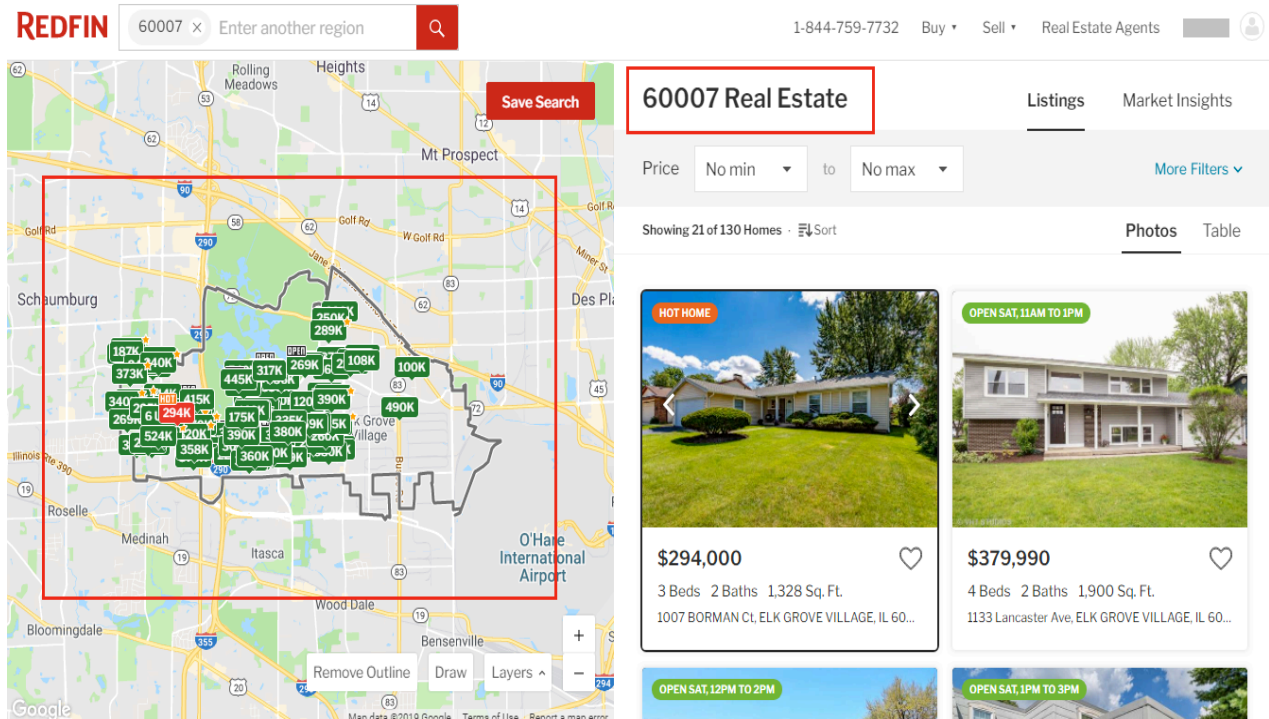
26. The patents related to the ‘854 patent and sharing the same specification were cited during the prosecution history of over 700 patents, including patents and applications owned by companies including Google, Inc., Microsoft Corporation, Amazon Technologies, Inc., Facebook, Inc., Ebay, Inc., Salesforce.com, Inc., IBM Corporation, Oracle International Corporation, Comcast Cable Communications, LLC, SAP AG, Citrix Systems, Inc., BEA Systems, Inc., Sprint Communications Company L.P., Siemens AG, AT&T Intellectual Property I, L.P., Hewlett-Packard Development Company, L.P., Fujitsu Limited, AOL LLC, General Electric Company, Accenture LLP, Adobe Systems Inc., Sony Computer Entertainment Inc., and Akamai Technologies, Inc. (See <http://patft.uspto.gov/netacgi/nph-Parser?Sect1=PTO2&Sect2=HITOFF&p=1&u=%2Fnetacgi%2Fsearch-bool.html&r=0&f=S&l=50&TERM1=5983227&FIELD1=UREF&co1=AND&TERM2=&FIELD2=&d=PTXT>).

27. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1-3, 8-10, and 15 of the '854 patent in Delaware, and elsewhere in the United States, by performing the claimed method, using the claimed computer-readable non-transitory medium storing computer instructions, and/or making and/or using the claimed system at redfin.com (“Accused Instrumentality”).

28. The Accused Instrumentality performs the step of receiving a user request for a customized page. For example, redfin.com receives a user request for a user customized page:



(E.g., <https://www.redfin.com/login-v2>).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

29. The Accused Instrumentality performs the step of receiving a template program (e.g., software instructions and data used for rendering a particular user's redfin.com page such as a JavaScript page) that is unique to the user and based on user configuration information (e.g., JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user). The user configuration information is supplied by the user (e.g., a user defines the information the user's template will display by inputting information such as the user's location; a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as the user's location) and used to build the template program that is unique to the user (e.g., user profile and user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page). The following screenshots demonstrate the result of the Accused Instrumentality satisfying these limitations:

REDFIN

60007 x Enter another region

1-844-759-7732 Buy Sell Real Estate Agents

Save Search

60007 Real Estate

Listings Market Insights

Price No min to No max More Filters

Showing 21 of 130 Homes Sort Photos Table

Map showing the area around Elk Grove Village, IL 60007. The map includes labels for Rolling Meadows, Heights, Mt Prospect, Schaumburg, Roselle, Medinah, Itasca, Wood Dale, Bensenville, and O'Hare International Airport. A red outline highlights the area of interest. Numerous green price markers are visible on the map, ranging from \$197K to \$490K.

HOT HOME

\$294,000
3 Beds 2 Baths 1,328 Sq. Ft.
1007 BORMAN Ct, ELK GROVE VILLAGE, IL 60007

OPEN SAT, 11AM TO 1PM

\$379,990
4 Beds 2 Baths 1,900 Sq. Ft.
1133 Lancaster Ave, ELK GROVE VILLAGE, IL 60007

OPEN SAT, 12PM TO 2PM

OPEN SAT, 1PM TO 3PM

(E.g., <https://www.redfin.com/zipcode/60007> (for a particular user)).

Showing 21 of 134 Homes Sort Photos Table

OPEN SAT, 2PM TO 4PM

\$437,000
4 Beds 2.5 Baths 1,740 Sq. Ft.
750 Winston Dr, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 3PM

\$229,000
4 Beds 2 Baths 2,036 Sq. Ft.
601 Walnut Ln, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 3PM

\$449,500
4 Beds 2.5 Baths 2,600 Sq. Ft.
736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007

OPEN SEP 8, 1PM TO 3PM

\$315,900
3 Beds 2 Baths 1,940 Sq. Ft.
1362 Cumberland Cir E, ELK GROVE VILLAGE, IL...

(E.g., <https://www.redfin.com/zipcode/60007> (for a particular user)).

```
{(0,o.default)(this,e)}return(0,i.default)(e,{key:"handleRoute",value:function(e){return setTimeout(0,0),e}}),
{key:"getBodyStartContent",value:function(e){var t="<script>".concat(m.getScript().text).concat(y.getScript().text,"</script>");return
e().then(function(e){return e.concat(t)}})},[{key:"whenInteractive",value:function(){return R().promise}}]],e
(),e.exports.getMetricValue=function(e){return(window._RUM||{})[e]},e.exports.getTimeSinceStart=function(){var
e=window.performance&&performance.timing.navigationStart;return e&&new Date-e},"7AK3":function(e,t,n){use
strict";Object.defineProperty(t,"_esModule",{value:!0}),t.default=function(){if(!0,i.isBrowser())return(0,o.default)("localStorage")}function()
{var e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{}},t.e.last_update||null;(null===t||!(n=t,n<Date.now()-9e5))&&function(){var
e=JSON.parse(localStorage.getItem("RF_PDP_VIEWS"))||{}},t=Object.keys(e).map(function(t){return[t,e[t].length]});t.sort(function(e,t){return t[1]-
e[1]});for(var n=[],r=0;r<Math.min(t.length,3)&&!(t[r][1]<3);r+=1)n.push(t[r][0]);if(n.length>0){var o=
{};o.pdp=n,o.last_update=Date.now(),localStorage.setItem("RF_FREQ_VIEW_PDP",JSON.stringify(o))}}();var
n;return(e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{}).pdp||null?{}:null;return null;var r,o=(r=n("luvc"))&&r._esModule?r:
{default:r,i=n("QP4D")};e.exports=t.default},"7Bly":function(e,t,n){use strict";var r;Object.defineProperty(t,"_esModule",
{value:!0}),t.default=void 0;var o=((r=n("cuw/"))&&r._esModule?r:{default:r}).default;t.default=o},"7GqP":function(e,t,n){use
strict";e.exports=n("Mwee")},"7NlyU":function(e){e.exports=["cache","beacons","customer-pages","mortgage","title","internal-tools","print-
pages","data-endpoints","manage-tour-insights","email-template","legacy","test-pages","performance-test-pages","iframes","error-
pages"]},"7SUW":function(e,t,n){var r=n("tQuQ"),o=n("MWVY"),i=n("Ejil"),a=n("1RMg"),s=n("qv24"),u=n("ZQY0"),l=n("SFv8"),c=
"/..."}(e,t,n)}(function(e,t,n){use strict";Object.defineProperty(t,"_esModule",{value:!0}),t.default=void 0;var r=i(n("oLrQ")),o=i(n("4ppV"));function i(e){return e&&e._esModule?e:
{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return
e&&"function"==typeof Symbol&&e.constructor===Symbol&&e!==Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var
r=t[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value"in r&&(r.writable=!0),Object.defineProperty(e,r.key,r)}function u(e,t)
{return t||"object"!==(a(t)&&"function"!=typeof t)?function(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't
been called");return e}(a):t}:function l(e){return(l=Object.setPrototypeOf?Object.getPrototypeOf:function(e){return
```

(E.g., <https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer->

<pages/62.d5a57144c6c9ab3b8d4a.bundle.js>).

```
r=n("A3BI"),o=n("KEy7"),i=n("ZpgJ"),a=n("SH7f"),s=n("luyf"),u={isLoggedIn:function(){var
e=i.getLoginStatusUtilCache();if(!0===e.isLoggedIn&&!1===e.isLoggedInIn)try{e.isLoggedInIn=void 0!==(r("RF_ACCESS_LEVEL"))&&void 0!==(r("RF_AUTH"))}catch(t)
{e.isLoggedInIn=!1}return e.isLoggedInIn},isLoggedInInAnonymously:function(){var
e=i.getLoginStatusUtilCache();if(u.isLoggedInIn())e.isAnonymouslyLoggedIn=!1;else
if(!0===e.isAnonymouslyLoggedIn&&!1===e.isAnonymouslyLoggedInIn)try{e.isAnonymouslyLoggedIn=void 0!==(r("RF_ANON_AUTH"))||void
0!==(r("RF_ANON_SECURE_AUTH"))}catch(t){e.isAnonymouslyLoggedIn=!1}return e.isAnonymouslyLoggedIn},cookieAccessLevel:function(){var
e=i.getLoginStatusUtilCache();if(!e.cookieAccessLevel)try{e.cookieAccessLevel=Number(r("RF_ACCESS_LEVEL"))}catch(t){e.cookieAccessLevel=1}return
e.cookieAccessLevel>0&&e.cookieAccessLevel<6?e.cookieAccessLevel:1},accessLevel:function(){return u.isLoggedInIn()?
u.cookieAccessLevel():1},clearCachedValues:function(){i.setLoginStatusUtilCache({});a.isStringray()?
(o.subscribe("onLoginDone",u.clearCachedValues),o.subscribe("onSocialLoginSuccess",u.clearCachedValues),u.clearCachedValues):s.onLoginDone.listen(
u.clearCachedValues),e.exports=u},"8WIM":function(e,t,n){var r=n("cvv2");e.exports=r.default},"8kLS":function(e,t,n){use
strict";Object.defineProperty(t,"_esModule",{value:!0}),t.default=void 0;var r=i(n("oLrQ")),o=i(n("4ppV"));function i(e){return e&&e._esModule?e:
{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return
e&&"function"==typeof Symbol&&e.constructor===Symbol&&e!==Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var
r=t[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value"in r&&(r.writable=!0),Object.defineProperty(e,r.key,r)}function u(e,t)
{return t||"object"!==(a(t)&&"function"!=typeof t)?function(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't
been called");return e}(a):t}:function l(e){return(l=Object.setPrototypeOf?Object.getPrototypeOf:function(e){return
```

(E.g., <https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer->

<pages/62.d5a57144c6c9ab3b8d4a.bundle.js>).


30. For example, each user's respective pages demonstrates that the template program is varied so that each user can receive appropriately customized pages (e.g., the code for each respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user). The screenshots below show two different template programs belonging to two respective users based on user configuration information with the user configuration information (including user demographic information) being supplied by the user that is used to build the template program that is unique to the user:

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User

The screenshot displays the Redfin website interface. At the top, the Redfin logo is on the left, followed by a search bar containing '93657' and a magnifying glass icon. To the right of the search bar are links for '1-844-759-7732', 'Buy', 'Sell', and 'Real Estate Agents'. Below the search bar, a map of the 93657 area is shown, with a red outline highlighting a specific region. To the right of the map, a sidebar titled '93657 Real Estate' contains filters for 'Price' (No min to No max) and 'More Filters'. Below the filters, it says 'Showing 21 of 132 Homes'. The main content area displays a grid of real estate listings. The first two listings are highlighted with red boxes. The first listing is a 'HOT HOME' with a price of \$270,000, 4 beds, 2 baths, and 1,627 sq. ft. The second listing is priced at \$359,900, with 3 beds, 3 baths, and 2,898 sq. ft. Below these, there are two more listings: one labeled 'NEW 29 HOURS AGO' and another labeled 'NEW 30 HOURS AGO'.

(<https://www.redfin.com/zipcode/93657> (for a particular user)).


REDFIN City, Address, School, Agent, ZIP 

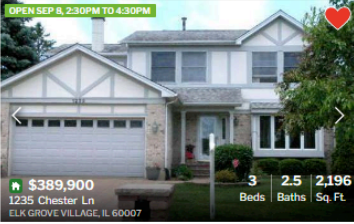
1-844-759-7732 Buy • Sell • Real Estate Ag

Favorites Saved Searches Open House Schedule Home Tours Your Agent Offers Reviews Owner Dashboard Email Settings Account Settings

Your Favorites (3) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ [Download](#) [Map Homes](#)

 Searching with someone? Share your favorite homes with your spouse or agent. [Invite your co-buyer](#) ×



OPEN SEP 8, 2:30PM TO 4:30PM

\$389,900 3 Beds 2.5 Baths 2,196 Sq. Ft.


1235 Chester Ln
ELK GROVE VILLAGE, IL 60007

Open House: **Sun, Sep 8th, 2PM** — [Add](#)

\$/Sq. Ft.	\$178	Year Built	1985
On Redfin	24 days	Lot Size	7,936 Sq. Ft.
HOA Dues	—	Status	Active

[Add a comment](#)

[Schedule Tour](#)



OPEN SUN, 12PM TO 3PM

\$112 34 days


Open House: **Sun, Sep 1st, 12PM** — [Add](#)

\$/Sq. Ft.	\$112	Year Built	1960
On Redfin	34 days	Lot Size	8,799 Sq. Ft.
HOA Dues	—	Status	Active

[Schedule Tour](#)

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

31. As another example, a user can customize their redfin.com page by selecting their saved deals, so that selected deals can be displayed. Below are screenshots pertaining to the selection process.


REDFIN City, Address, School, Agent, ZIP 


1-844-759-7732 Buy • Sell • R

Favorites Saved Searches Open House Schedule Home Tours Your Agent Offers Reviews Owner Dashboard Email Settings Account Settings

Your Favorites (0) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ [Download](#) [Map Homes](#)

 Searching with someone? Share your favorite homes with your spouse or agent. [Invite your co-buyer](#) ×

 You have no favorites

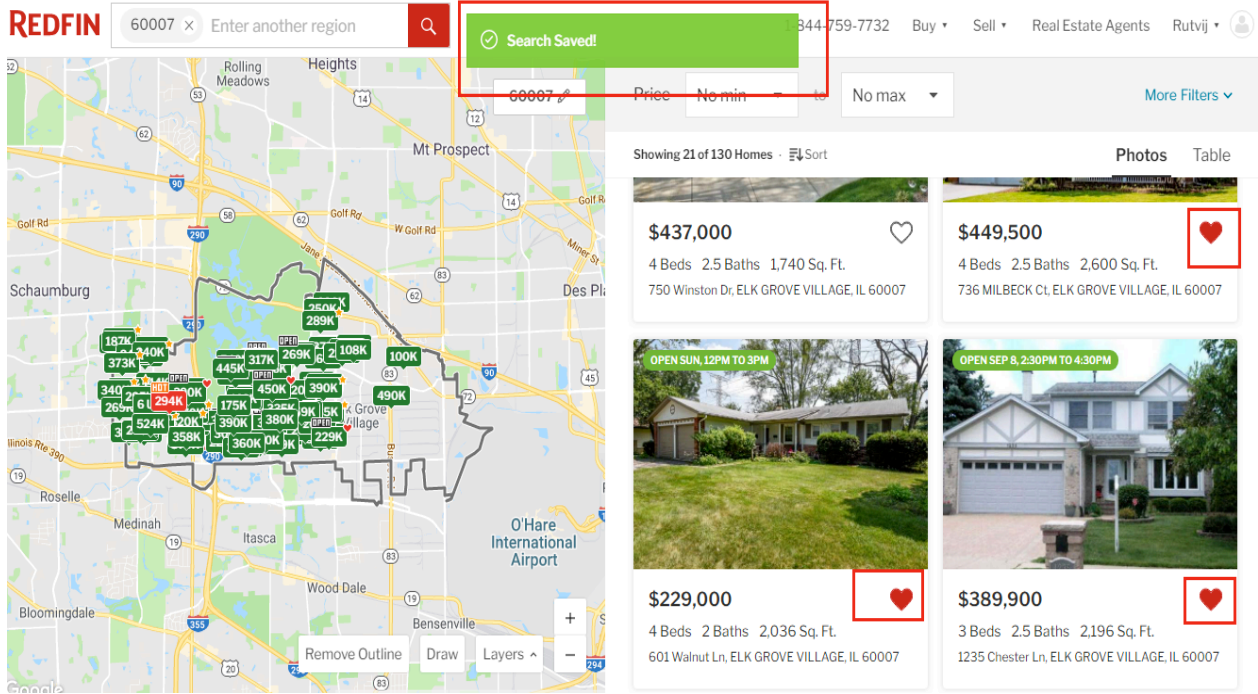
Favorite homes while you browse to stay up to date on price and status changes.

[Browse Homes](#)

About Press Blog Jobs Contact Us Help

Updated January 2019: By searching, you agree to the [Terms of Use](#), and [Privacy Policy](#).
Copyright: © 2019 Redfin. All rights reserved. Patent pending.

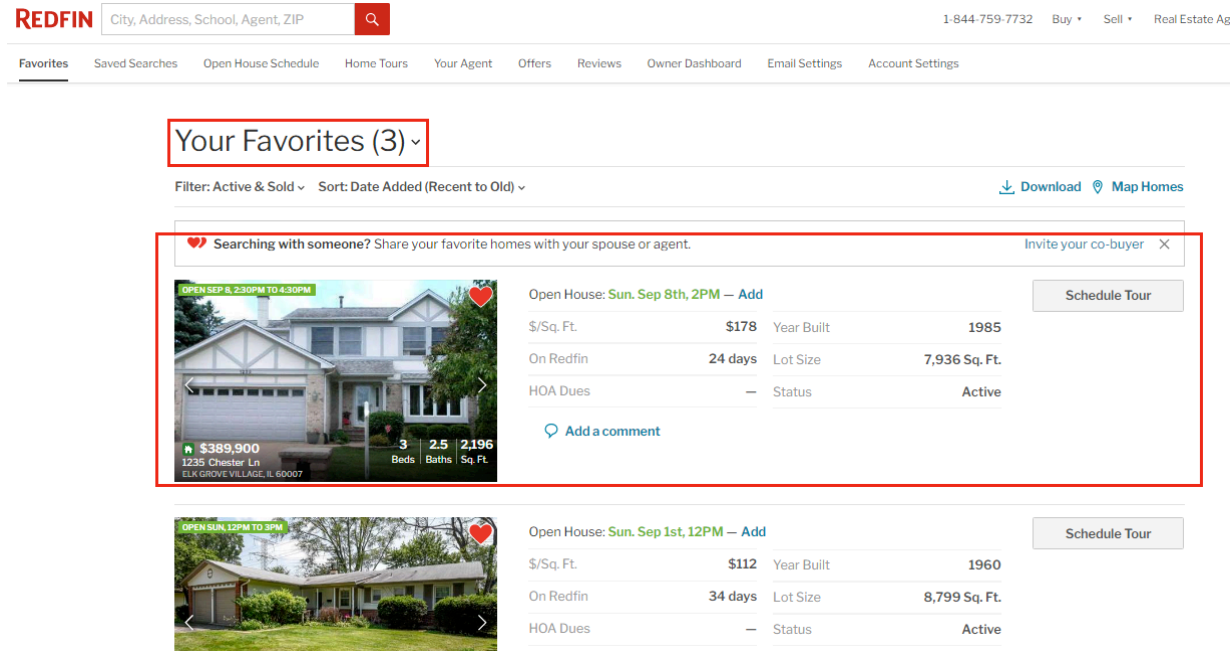
(<https://www.redfin.com/myredfin/favorites> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

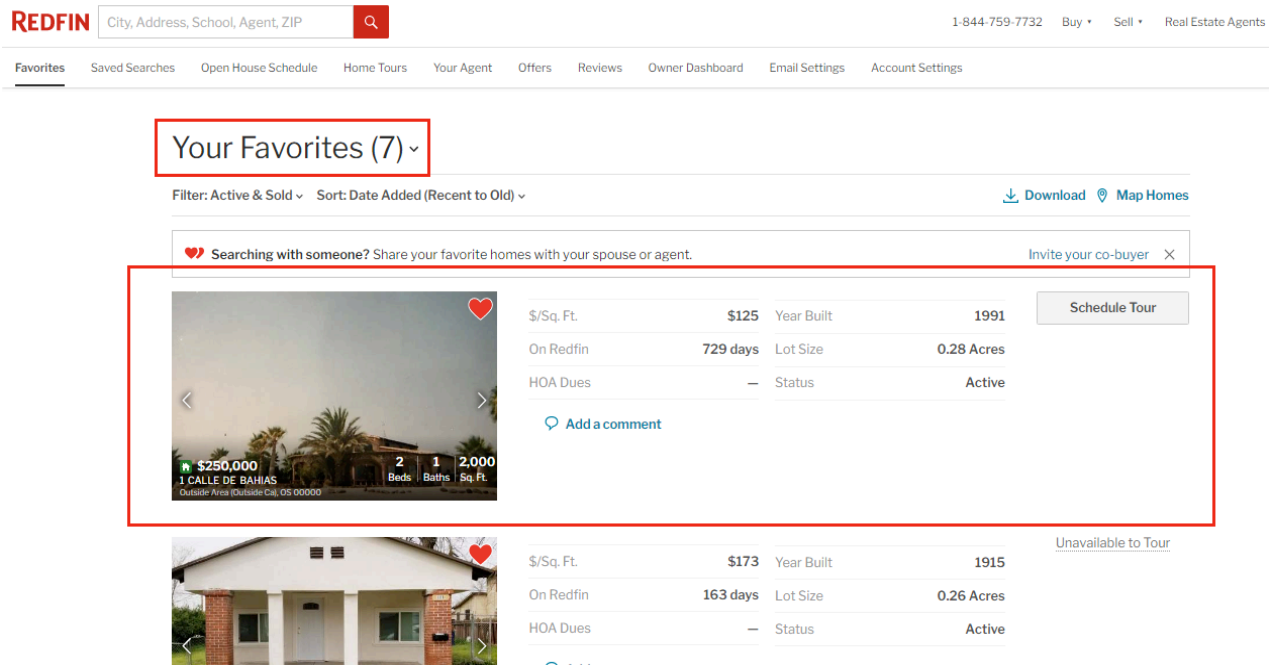
Shown below are screenshots of webpages customized according to the selected property related deals of two respective users.

First User



(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User



(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

On information and belief, “Favorite houses” data is stored locally in cookies. The JavaScript file, which has a utility function, is retrieved from the CDN and handles storing and retrieval of the favorite houses, and user data stored and retrieved from local storage or cookie locations.

32. The user configuration information supplied by the user to build the template program includes user demographic information (e.g., a user’s profile information and/or configuration information such as the user’s name, address, postal code and other information). (E.g., <https://www.redfin.com/about/privacy-policy>).

33. The template program is received from one of at least two locations (e.g., the data and templates comprising a user’s page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized redfin.com page

(e.g., based on the frequency at which a user logs in or accesses their redfin.com page, the data comprising the users page may be stored at a main server). On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in local storage on the user's computer. On information and belief, running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available properties and other site logic-based conditions. On information and belief, the user information is stored in multiple locations, which can include, (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
(0,o.default)(this,e))return(0,i.default)(e,{[key:"handleRoute",value:function(e){return setTimeout(0,0),e()}},  
{key:"getBodyStartContent",value:function(e){var t=<script>.concat(m.getScript().text).concat(y.getScript().text,</script>);return  
e.then(function(e){return e.concat(t)}}},{[key:"whenInteractive",value:function(){return R().promise()}],e  
()),e.exports.getMetricValue=function(e){return(window._RUM||[])[e]},e.exports.getTimeSinceStart=function(){}var  
e=window.performance&&performance.timing.navigationStart;return e&&new Date-e)},7AK3}(function(e,t,n){  
"use strict";Object.defineProperty(t,"_esModule",{value:!0});t.default=function(i){if(!0===i.isBrowser()){return(o.o.default)("localStorage")?function()  
{var e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{};t=e.last_update||null;(null===t||(n=t,n<Date.now()-9e5)&&function(){var  
e=JSON.parse(localStorage.getItem("RF_FREQ_VIEWSW"))||{};t=Object.keys(e).map(function(t){return t[e.t.length]});t.sort(function(e,t){return t[1]-  
e[1]});for(var n=[],r=0;r<Math.min(t.length,3)&&!t[r][1]<3;r+=1)n.push(t[r][0]);if(n.length>0){var o=  
{};o.pdp=n,o.last_update=Date.now(),localStorage.setItem("RF_FREQ_VIEW_PDP",JSON.stringify(o))}}();var  
n;return(e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{}).pdp||null}():null;return null};var r,o=(r=n("lucv"))&&r.__esModule?:r:  
{default:r,i=n("QP40"),e.exports:t.default,"78ly":function(e,t,n){  
"use strict";var r;o:Object.definePropertyProperty(t,"_esModule",{  
value:!0}),t.default=void 0;var o=((r=n("cuw"/)))&&r.__esModule?:r:(default:r).default;t.default=o},"7GgP"(function(e,t,n){  
"use strict";e.exports=n("Mwee"),"7NyU"(function(e){e.exports=["cache","beacons","customer-pages","mortgage","title","internal-tools","print-  
pages","data-endpoints","manage-tour-insights","email-template","legacy","test-pages","performance-test-pages","iframes","error-  
pages"]},"7SUL":function(e,t,n){var r=n("TJQu"),o=n("MMVY"),i=n("Ejil"),a=n("IRMg"),s=n("qz24"),u=n("ZQY0"),l=n("SFv8"),c=  
6e+03,t=i+d("HIO-PB"),d=c("CUF5");e.exports={defineProperty:Object.defineProperty,["__esModule"],...l}})
```

(<https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer-pages/62.d5a57144c6c9ab3b8d4a.bundle.js> (for a particular user)).

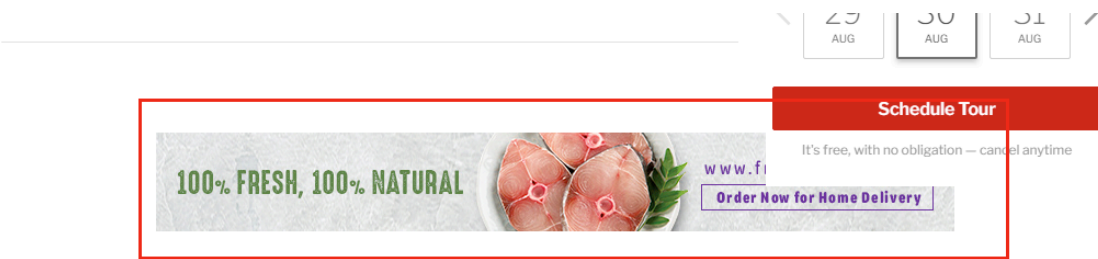
```
n=n("A3BI"),o=n("KEy7"),i=n("Zpg3"),a=n("SH7F"),s=n("1uyf"),u={isLoggedIn:function(){var e=i.getLoginStatusUtilCache();if(!0!===e.isLoggedInIn&&1!===e.isLoggedInIn)try{e.isLoggedInIn=void 0!===r("RF_ACCESS_LEVEL")&&void 0!===r("RF_AUTH"))}catch(t){e.isLoggedInIn=1}return e.isLoggedInIn},isLoggedInIn:isLoggedInInAnonymously:function(){var e=i.getLoginStatusUtilCache();if(u.isLoggedInIn())e.isAnonymouslyLoggedIn=!1;else e.isLoggedInIn=1;isAnonymouslyLoggedInIn&&1!===e.isAnonymouslyLoggedInIn?e.isAnonymouslyLoggedInIn=void 0!===r("RF_ANON_AUTH")||void 0!===r("RF_ANON_SECURE_AUTH"))}catch(t){e.isAnonymouslyLoggedInIn=1}return e.isAnonymouslyLoggedInIn},cookieAccessLevel:function(){var e=i.getLoginStatusUtilCache();if(!e.cookieAccessLevel)try{e.cookieAccessLevel=Number(r("RF_ACCESS_LEVEL"))}catch(t){e.cookieAccessLevel=1}return e.cookieAccessLevel}&&e.cookieAccessLevel<6?e.cookieAccessLevel=1},accessLevel:function(){return u.isLoggedInIn()?u.cookieAccessLevel(1),clearCachedValues:function(){i.setLoginStatusUtilCache({});a.isStringray()?(o.subscribe("onLoginDone",u.clearCachedValues),o.subscribe("onSocialLoginSuccess",u.clearCachedValues),u.clearCachedValues():s.onLoginDone.listen(u.clearCachedValues),e.exports=u},8*10^11:function(e,t,n){var r=n("cgv2"),e.exports=r.default},8k15:function(e,t,n){"use strict";Object.defineProperty(t,"__esModule",{value:!0}),t.default=void 0;var r=i(n("OLrQ")),o=i(n("4ppw"));function i(e){return e&&e.__esModule?e:{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return e&&"function"==typeof Symbol&&e.constructor==Symbol&&e==Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var r=[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value" in r&&r.writable=!0,Object.defineProperty(e,r.key,r)}function u(e,t){return!(!Object.prototype.hasOwnProperty.call(e,t))&&"function"==typeof t}function i(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't been called");return e}.t=function(e,t){function i(e){return!0}Object.setPrototypeOf(i,GetPrototypeOf(e));return i}}function
```

(*Id.*).


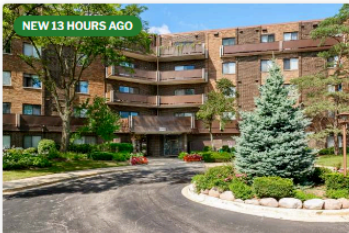

34. The Accused Instrumentality performs the step of receiving an advertisement selected in accordance to the user demographic information (*e.g.*, redfin.com provides advertisements to a user based on demographic). (*E.g.*, <https://www.redfin.com/about/privacy-policy>). For example, the accused instrumentality has targeted advertising to users based on a user's geography and interest. (*Id.*).

35. The Accused Instrumentality performs the step of executing the template program (*e.g.*, JavaScript templates) using the selected advertisement (*e.g.*, an advertisement selected based on a user's demographic information) to generate the customized page (*e.g.*, a user's redfin.com page with the advertisement integrated). (*E.g.*, <https://www.redfin.com/CA/Sanger/1821-Hunter-Ave-93657/home/95985779> (for a particular user)).

36. The Accused Instrumentality performs the step of providing the customized page to the user (*e.g.*, a user's redfin.com page with integrated advertisements).



The screenshot shows a Redfin real estate listing page. At the top right, there are date filters for August (27, 30, 31). Below these is a red banner with the text "Schedule Tour" and "It's free, with no obligation — cancel anytime". Below the banner is a promotional image for "100% FRESH, 100% NATURAL" salmon, with a "www.f" logo and a "Order Now for Home Delivery" button. Below the promotional image is a section titled "Nearby Similar Homes" with a subtext: "Homes similar to 920 Ridge Sq #100 are listed between \$90K to \$410K at an average of \$140 per square foot." Below this are three property listings, each with a photo, price, and details.

Property 1	Property 2	Property 3
		
\$129,900	\$89,900	\$115,000
1 Bed 1 Bath 900 Sq. Ft.	1 Bed 1 Bath 900 Sq. Ft.	2 Beds 1 Bath 1,100 Sq. Ft.
840 WELLINGTON Ave #112, ELK GROVE VILLA...	840 WELLINGTON Ave #212, ELK GROVE VILLA...	1910 W HATHERLEIGH Ct Unit 1E, MOUNT PROS...

(E.g., <https://www.redfin.com/IL/Elk-Grove-Village/920-Ridge-Sq-60007/unit-100/home/18930183> (for a particular user)).

Fresno County \$315,000 \$171 99.9%

01/18 07/18 01/19 07/19

Schedule Tour

It's free, with no obligation — cancel anytime

Ask a Question (559) 847-0228

Instant Grammar Checker
Correct all grammar errors and enhance your writing. **Try Now**

Nearby Similar Homes
Homes similar to 1821 Hunter Ave are listed between \$90K to \$980K at an average of \$180 per square foot.

(E.g., <https://www.redfin.com/CA/Sanger/1821-Hunter-Ave-93657/home/95985779> (for a particular user)).

37. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '854 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

38. On information and belief, Defendant has had at least constructive notice of the '854 patent by operation of law, and there are no marking requirements that have not been complied with.

IV. COUNT II
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 5,983,227)

39. Plaintiff incorporates the above paragraphs herein by reference.

40. On November 9, 1999, United States Patent No. 5,983,227 (“the ‘227 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘227 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘227 Patent is attached hereto as Exhibit B and incorporated herein by reference.

41. Digi Portal is the assignee of all right, title and interest in the ‘227 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘227 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘227 Patent by Defendant.

42. The application leading to the ‘227 patent was filed June 12, 1997. (Ex. B at cover). The ‘227 patent was first assigned to Yahoo! Inc. (*Id.*).

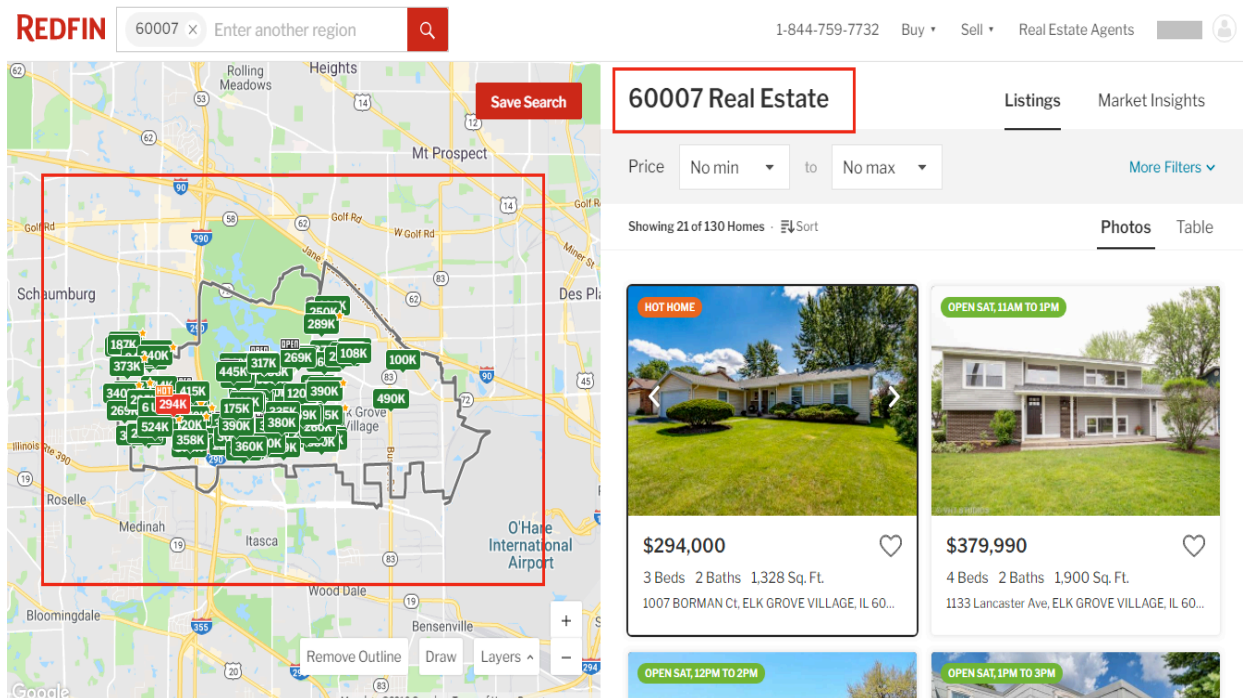
43. The invention in the ‘227 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:14-18).

44. The ‘227 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, as show in the prosecution history of the ‘227 Patent, it was unconventional to download real-time information into a server and use a template for the static data as opposed to linking directly to real-time information. (Ex. E at 5, Ex. F at 2).

45. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 2 of the ‘227 patent in Delaware, and elsewhere in the United States, by

performing actions comprising using or performing the claimed method of providing real-time responses to user requests for customized pages, including without limitation through the method implemented of providing a user's refin.com page ("Accused Instrumentality"). (E.g., <https://www.redfin.com/>).

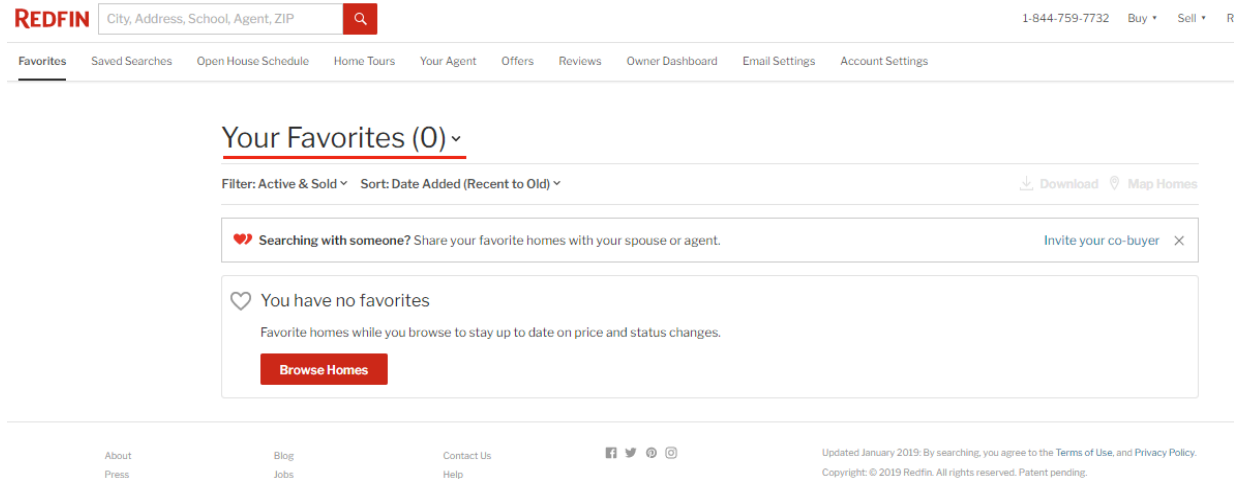
46. The Accused Instrumentality performs the step of obtaining user preferences (e.g., location, house size, price, etc.), wherein a user's user preferences indicate items of interest to that user. For example, users can customize their location on their redfin.com page to find current property related deals near their location:



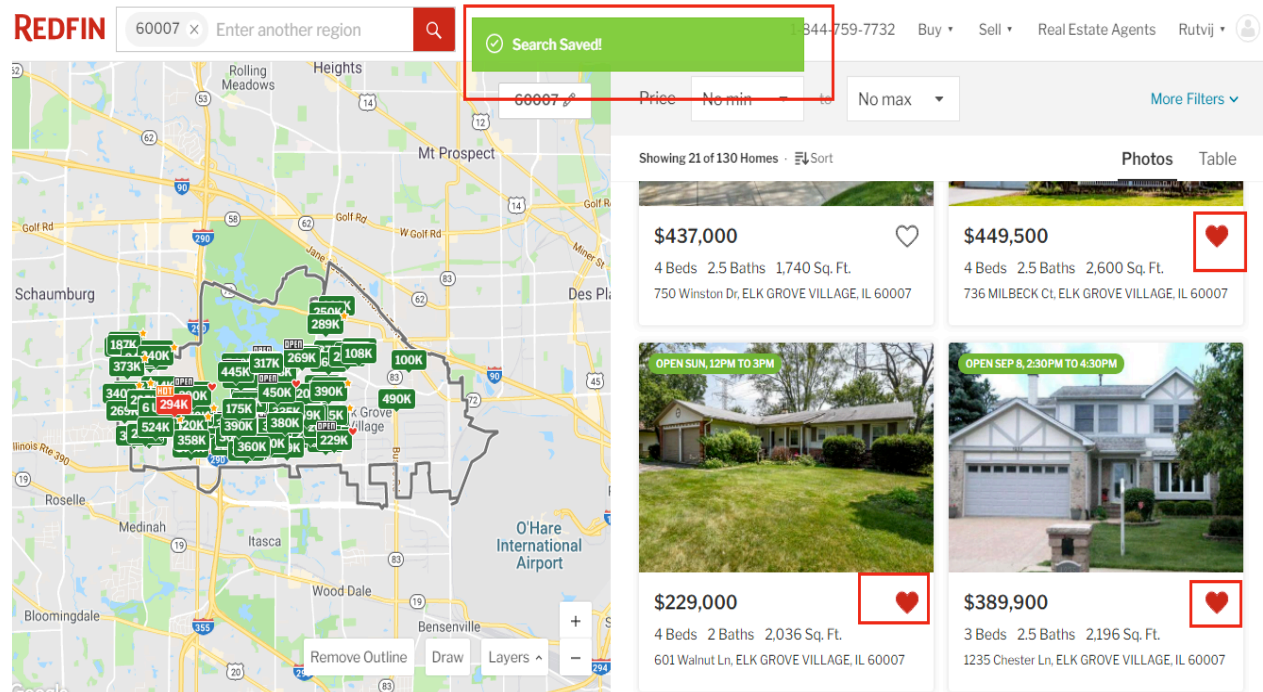
(<https://www.redfin.com/zipcode/60007> (for a particular user)).

47. The following screenshots are pages for two different users that have varying house listings displayed based upon the users' respective locations:

48. Additionally, a user can also customize their redfin.com page by selecting their favorite houses, so that selected favorite houses can be displayed. The following are screenshots pertaining to the selection process:



(<https://www.redfin.com/myredfin/favorites> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

49. The following screenshots are webpages customized according to the selected favorite houses of two respective users:

First User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3)

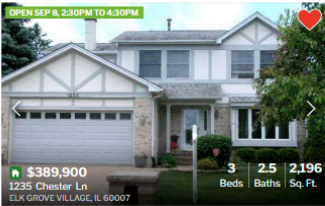
Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.

Open House: Sun. Sep 8th, 2PM – Add

Schedule Tour

\$/Sq. Ft. \$178

Year Built 1985

On Redfin 24 days


Lot Size 7,936 Sq. Ft.

HOA Dues —

Status Active

Add a comment

OPEN SUN 12PM TO 3PM



\$112

Year Built 1960

On Redfin 34 days

Lot Size 8,799 Sq. Ft.

HOA Dues —

Status Active

Schedule Tour

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

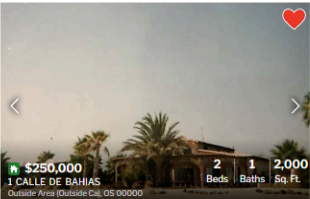
Your Favorites (7)

Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer



\$250,000

1 CALLE DE BAHIAS

Outside Area (Outside Cal, 05 00000)

2 Beds

1 Baths

2,000 Sq. Ft.

\$/Sq. Ft. \$125

Year Built 1991

On Redfin 729 days


Lot Size 0.28 Acres

HOA Dues —

Status Active

Add a comment

Schedule Tour



\$173

Year Built 1915

On Redfin 163 days

Lot Size 0.26 Acres

HOA Dues —

Status Active

Unavailable to Tour

29

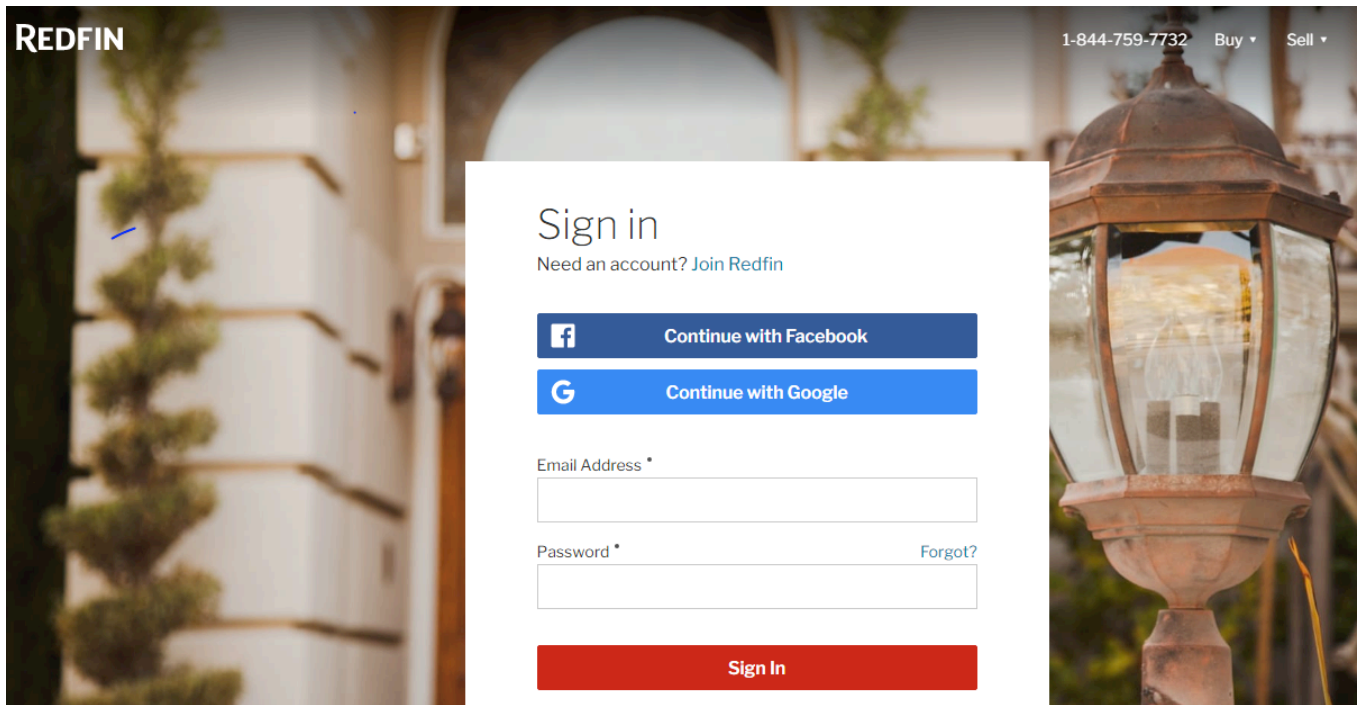
(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

50. On information and belief, the Accused Instrumentality performs obtaining real-time information (*e.g.*, current property listings and advertisements) from information sources (*e.g.*, redfin.com's servers/databases which store real-time property listings and the Google server which houses advertisements) and storing the real-time information in a storage device (*e.g.*, the property listings and advertisements will be pulled from a storage server and sent to redfin.com's web/API server so that the information can be used as input in a template program to generate a customized page that is provided to a user).


51. On information and belief, the Accused Instrumentality performs the step of combining the user preferences for the user (*e.g.*, user location, selected favorite houses) and a template (*e.g.*, generic template) to form a template program specific to the user. On information and belief, the Accused Instrumentality forms a template program (*e.g.*, software instructions and data used for rendering a particular user's redfin.com page such as a JavaScript page) that is unique to the user (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user preferences (*e.g.*, a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as their location). On information and belief, the Accused Instrumentality uses preference information for the user and a global template that is generic to a plurality of users to form a customized template program unique to a user. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage.


52. On information and belief, the Accused Instrumentality performs the step of receiving, from a user and at the server, a user request for a customized page (*e.g.*, when a user

logs in to redfin.com, property searches will be limited to a user's location and advertisements will be targeted towards a user's interest) customized according to the user preferences. The following screenshots are examples of the request for a customized page that is customized according to the user preferences:



(<https://www.redfin.com/login-v2> (for a particular user)).

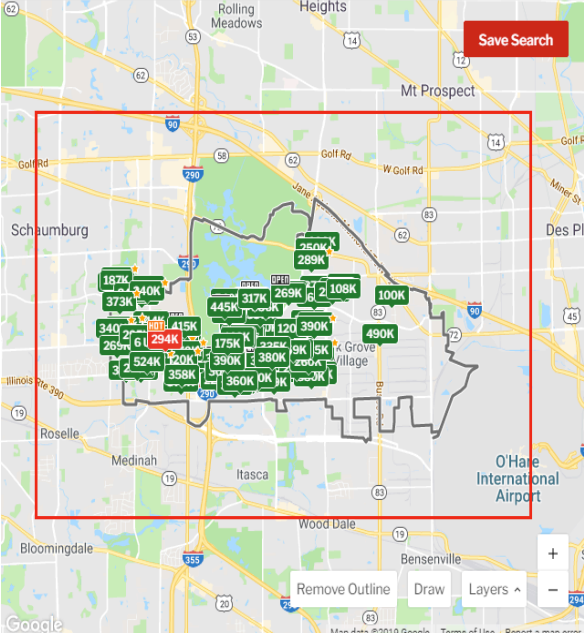
REDFIN 60007 x Enter another region 

1-844-759-7732 Buy Sell Real Estate Agents 

60007 Real Estate Listings Market Insights

Price No min to No max [More Filters](#)

Showing 21 of 130 Homes Sort [Photos](#) [Table](#)



HOT HOME

\$294,000 3 Beds 2 Baths 1,328 Sq. Ft.
1007 BORMAN Ct, ELK GROVE VILLAGE, IL 60007

\$379,990 4 Beds 2 Baths 1,900 Sq. Ft.
1133 Lancaster Ave, ELK GROVE VILLAGE, IL 60007

OPEN SAT, 11AM TO 1PM

OPEN SAT, 12PM TO 2PM

OPEN SAT, 1PM TO 3PM

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Showing 21 of 134 Homes Sort [Photos](#) [Table](#)

\$437,000 4 Beds 2.5 Baths 1,740 Sq. Ft.
750 Winston Dr, ELK GROVE VILLAGE, IL 60007

\$449,500 4 Beds 2.5 Baths 2,600 Sq. Ft.
736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007

\$229,000 4 Beds 2 Baths 2,036 Sq. Ft.
601 Walnut Ln, ELK GROVE VILLAGE, IL 60007

\$315,900 3 Beds 2 Baths 1,940 Sq. Ft.
1362 Cumberland Cir E, ELK GROVE VILLAGE, IL...

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

53. The Accused Instrumentality performs the step of executing the template program specific to the user (*e.g.*, page generation code, tiles, containers, and user data) using the real-time information stored in the storage device (*e.g.*, house listings and advertisements, stored in a storage database/server) as input to the template program to generate the customized page (*e.g.*, the house deals, and advertisements will be inputted into a template program so that the appropriate web page will be generated and displayed to the user). The following sets of screen screenshots are examples of customizing a user's redfin.com page from two different users that have varying current housing listings displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user).

First User:

The screenshot displays the Redfin website interface for the 60007 zip code. On the left, a map shows the geographic area with various house listings marked by price tags (e.g., \$294K, \$379,990). A red box highlights a specific area on the map. On the right, the '60007 Real Estate' section is visible, featuring a search bar with '60007' entered, a 'Save Search' button, and a list of properties. The first two properties are highlighted with red boxes:

- Property 1:** \$294,000, 3 Beds, 2 Baths, 1,328 Sq. Ft., 1007 BORMAN Ct, ELK GROVE VILLAGE, IL 60... (HOT HOME)
- Property 2:** \$379,990, 4 Beds, 2 Baths, 1,900 Sq. Ft., 1133 Lancaster Ave, ELK GROVE VILLAGE, IL 60... (OPEN SAT, 11AM TO 1PM)

Below these, two more properties are partially visible with 'OPEN SAT' time slots.

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732 Buy Sell Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3) ~

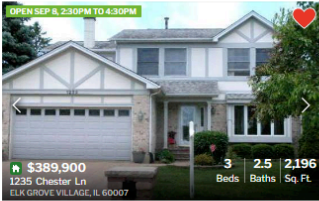
Filter: Active & Sold Sort: Date Added (Recent to Old) ~

Download

Map Homes

Searching with someone? Share your favorite homes with your spouse or agent. Invite your co-buyer X

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.


Open House: Sun. Sep 8th, 2PM — Add

\$/Sq. Ft.	\$178	Year Built	1985
On Redfin	24 days	Lot Size	7,936 Sq. Ft.
HOA Dues	—	Status	Active

Add a comment

Schedule Tour

OPEN SUN, 12PM TO 3PM



\$112

Year Built

1960

Open House: Sun. Sep 1st, 12PM — Add

\$/Sq. Ft.	\$112	Year Built	1960
On Redfin	34 days	Lot Size	8,799 Sq. Ft.
HOA Dues	—	Status	Active

Schedule Tour

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

93657 x Enter another region

1-844-759-7732 Buy Sell Real Estate Agents

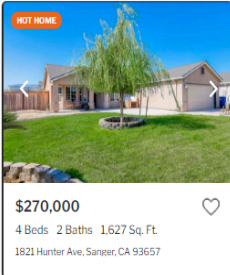
93657 Real Estate

Listings Market Insights

Price No min to No max More Filters ~

Showing 21 of 132 Homes ~ Sort Photos Table

NOT HOME

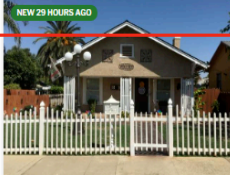


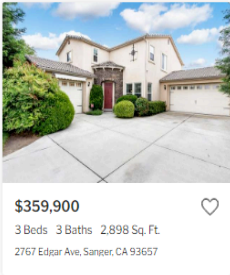
\$270,000

4 Beds 2 Baths 1,627 Sq. Ft.

1821 Hunter Ave, San Jose, CA 93657

NEW 29 HOURS AGO



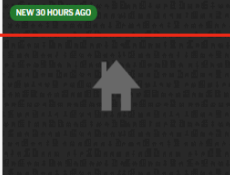


\$359,900

3 Beds 3 Baths 2,898 Sq. Ft.


2767 Edgar Ave, San Jose, CA 93657

NEW 30 HOURS AGO



(<https://www.redfin.com/zipcode/93657> (for a particular user)).



34

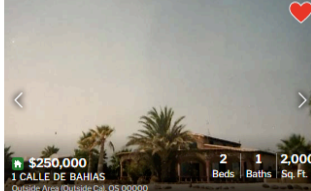
REDFIN City, Address, School, Agent, ZIP  1-844-759-7732 Buy • Sell • Real Estate Agents

Favorites Saved Searches Open House Schedule Home Tours Your Agent Offers Reviews Owner Dashboard Email Settings Account Settings

Your Favorites (7) ▾


Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ [Download](#) [Map Homes](#)

 Searching with someone? Share your favorite homes with your spouse or agent. [Invite your co-buyer](#) 



\$/Sq. Ft.	\$125	Year Built	1991	Schedule Tour
On Redfin	729 days	Lot Size	0.28 Acres	
HOA Dues	—	Status	Active	

[Add a comment](#)



\$/Sq. Ft.	\$173	Year Built	1915	Unavailable to Tour
On Redfin	163 days	Lot Size	0.26 Acres	
HOA Dues	—	Status	Active	

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

54. The Accused Instrumentality performs the step of providing the customized page to the user (e.g., a user's redfin.com page, search results, etc. with integrated advertisements) wherein the steps of executing and providing are performed in real-time response to receipt of the user request in the step of receiving (e.g., user login request, search initiation, etc.) and wherein the customized page includes at least one item of real-time information (e.g., current house listings or current advertisements) selected from the storage device (e.g., pulled from storage servers/databases and sent to an API/webserver for processing/display). (E.g., screenshots in paragraphs 52 and 53).

55. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '227 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

56. On information and belief, Defendant has had at least constructive notice of the ‘227 patent by operation of law, and there are no marking requirements that have not been complied with.

V. COUNT III
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,171,414)

57. Plaintiff incorporates the above paragraphs herein by reference.

58. On January 30, 2007, United States Patent No. 7,171,414 (“the ‘414 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘414 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘414 Patent is attached hereto as Exhibit G and incorporated herein by reference.

59. Digi Portal is the assignee of all right, title and interest in the ‘414 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘414 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘414 Patent by Defendant.

60. The application leading to the ‘414 patent was filed September 10, 1999, which was a continuation of application no. 08/873,975, which issued as the ’227 patent. (Ex. G at cover). The ‘414 patent was first assigned to Yahoo! Inc. (*Id.*).

61. The invention in the ‘414 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:29-33).

62. The ‘414 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘414 patent highlights advantages and

unconventional features of the claimed invention including the “storing real-time information in a shared local storage device.” An example of this limitation is when live data used to fill templates is stored local to the page server which is handling user requests for custom web pages. (Ex. I at 8; Ex. G at col. 2:11-15). Every piece of information that a person can request on a page is storable in a shared memory closely coupled to a page generator. (Ex. I at 9; Ex. G at col. 4:43-58). Unlike the prior art CGI process that required time consuming calls to other servers, storing real-time information in a shared local storage device, allows for any custom page to be built within the page server thereby eliminating the need to make requests from other servers for portions of the live data. (Ex. I at 9; Ex. G at col. 2:25-31).

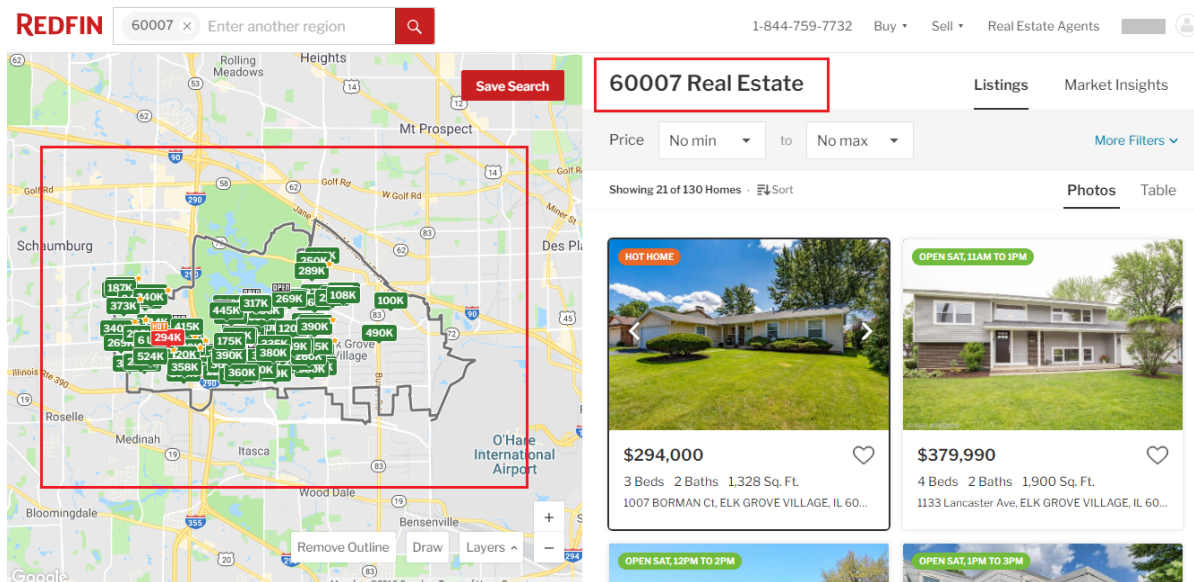
63. Furthermore, as show in the prosecution history of the ‘414 Patent, it was unconventional to receive the template program from one of at least two location, the frequency of the user request for the customized page determines the retrieval location of the template program. (Ex. H at 9-10). In the prior art, the published web site was stored on a server and provided from one server location regardless of the frequency of the user requests for the web site. (*Id.*). The examiner agreed that the claim was allowable because the prior art did not disclose that in a page server coupled to a network a method of providing a customized page to a user, the customized page is customized according to the user’s preferences, and the template is received from one of at least two locations, the location determined from frequency of the user request for the customized page. (Ex. J at 3).

64. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 3 of the ‘414 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method using the redfin.com website (“Accused Instrumentality”). The Accused Instrumentality uses a page

server (e.g., the redfin.com server), to provide a customized page (e.g., user-specific web page, search results, etc.) to a user, wherein the customized page is customized according to the user's preferences (e.g., user location, user interests, etc.).

65. On information and belief, the Accused Instrumentality performs the step of obtaining real-time information (e.g., current house listings and advertisements) from information sources (e.g., storage servers/databases that store property listings and advertisements) and stores them in a shared local storage device (e.g., the data will be pulled from storage servers/databases and stored, at least temporarily, at a local web/API server, for processing and subsequent display to a user).

66. For example, users can customize their location on their redfin.com page to find current housing deals near their location:





(<https://www.redfin.com/zipcode/60007> (for a particular user)). Furthermore, a user's redfin.com page is customized by the location information provided by the user:

Showing 21 of 134 Homes · Sort

Photos Table

OPEN SAT, 2PM TO 4PM





\$437,000 

4 Beds 2.5 Baths 1,740 Sq. Ft.

750 Winston Dr, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 5PM





\$449,500 

4 Beds 2.5 Baths 2,600 Sq. Ft.

736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 3PM





\$229,000 

4 Beds 2 Baths 2,036 Sq. Ft.

601 Walnut Ln, ELK GROVE VILLAGE, IL 60007

OPEN SEP 8, 1PM TO 3PM



\$315,900 

3 Beds 2 Baths 1,940 Sq. Ft.

1362 Cumberland Cir E, ELK GROVE VILLAGE, IL...

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

67. As another example, a user's redfin.com page will also be customized to show current housing deals near the location linked to a user's account.

First User:

REDFIN 60007 x Enter another region

1-844-759-7732 Buy Sell Real Estate Agents

60007 Real Estate Listings Market Insights

Price No min to No max More Filters

Showing 21 of 130 Homes Sort Photos Table

HOT HOME
\$294,000
3 Beds 2 Baths 1,328 Sq. Ft.
1007 BORMAN CL. ELK GROVE VILLAGE, IL 60...

OPEN SAT. 11AM TO 1PM
\$379,990
4 Beds 2 Baths 1,900 Sq. Ft.
1133 Lancaster Ave. ELK GROVE VILLAGE, IL 60...

OPEN SAT. 12PM TO 2PM
OPEN SAT. 1PM TO 3PM

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Second User:

REDFIN 93657 x Enter another region

1-844-759-7732 Buy Sell Real Estate Agents

93657 Real Estate Listings Market Insights

Price No min to No max More Filters

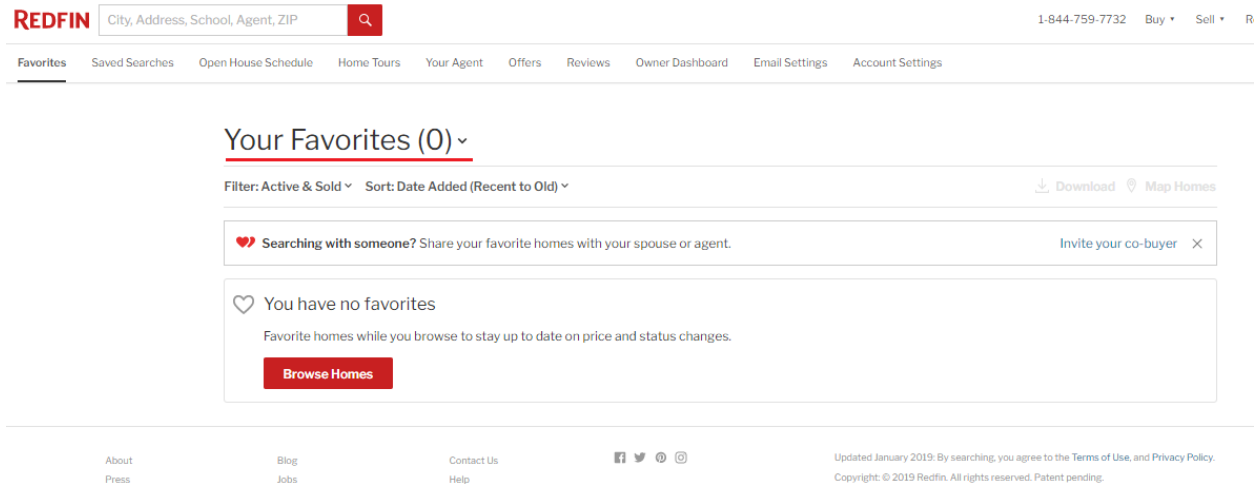
Showing 21 of 132 Homes Sort Photos Table

HOT HOME
\$270,000
4 Beds 2 Baths 1,627 Sq. Ft.
1821 Hunter Ave. San Jose, CA 93657

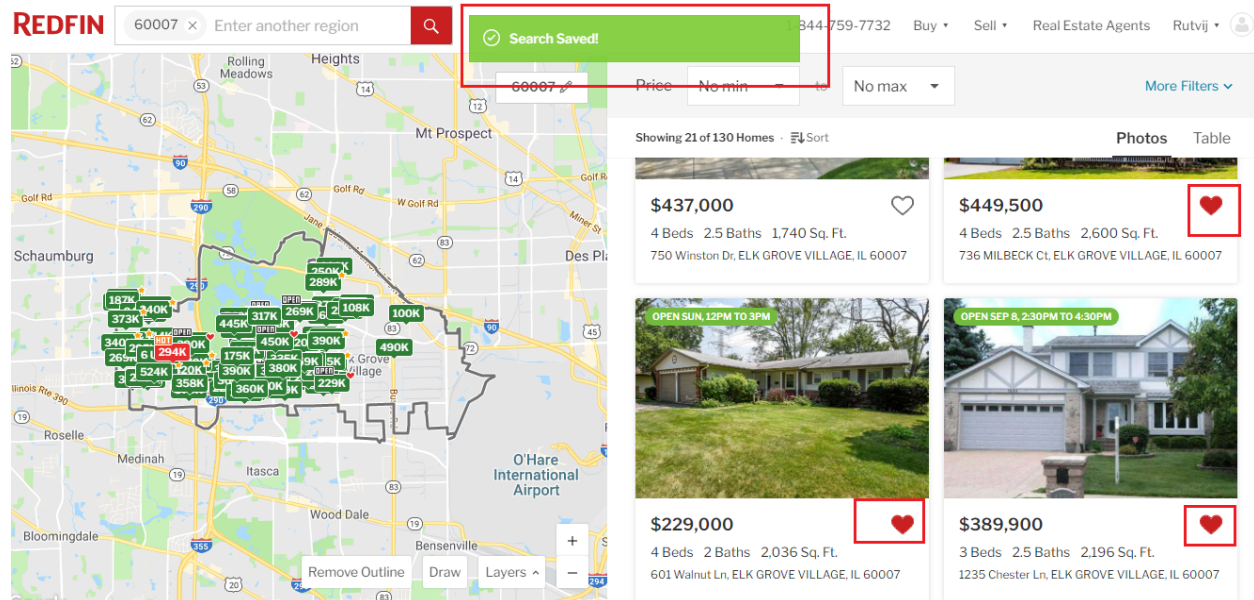
NEW 29 HOURS AGO
\$359,900
3 Beds 3 Baths 2,898 Sq. Ft.
2767 Edgemoor Ave. San Jose, CA 93657

NEW 30 HOURS AGO

(<https://www.redfin.com/zipcode/93657> (for a particular user)). A user can also customize their redfin.com page by selecting their favorite houses, so that selected favorite houses can be displayed. Below are screenshots pertaining to the selection process.



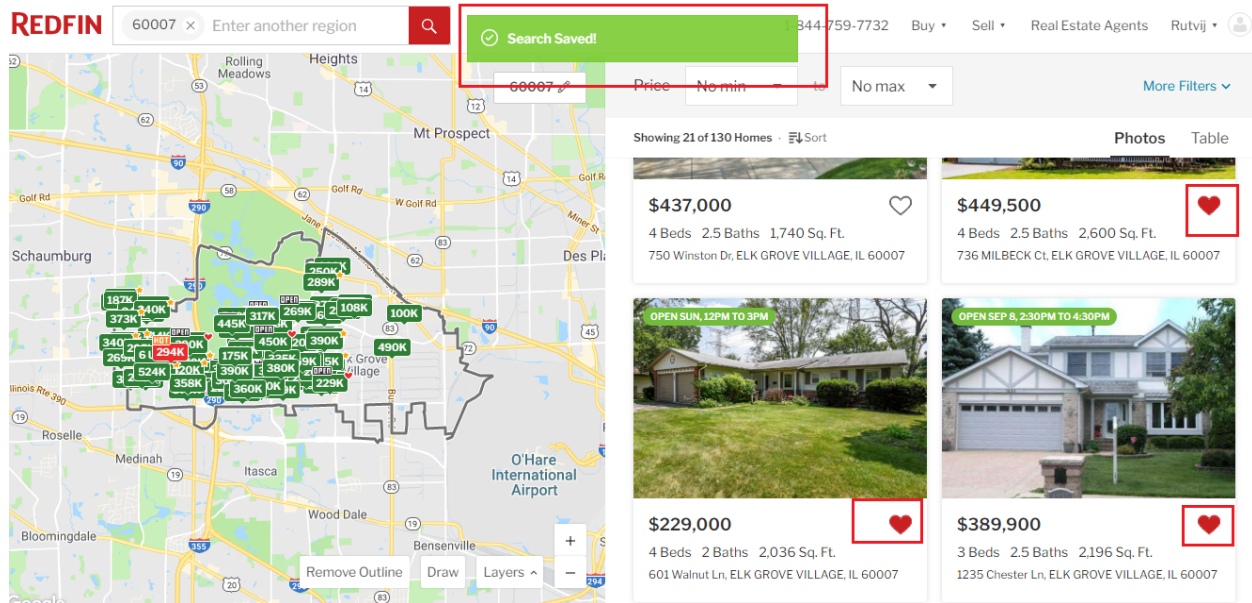
(<https://www.redfin.com/myredfin/favorites> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

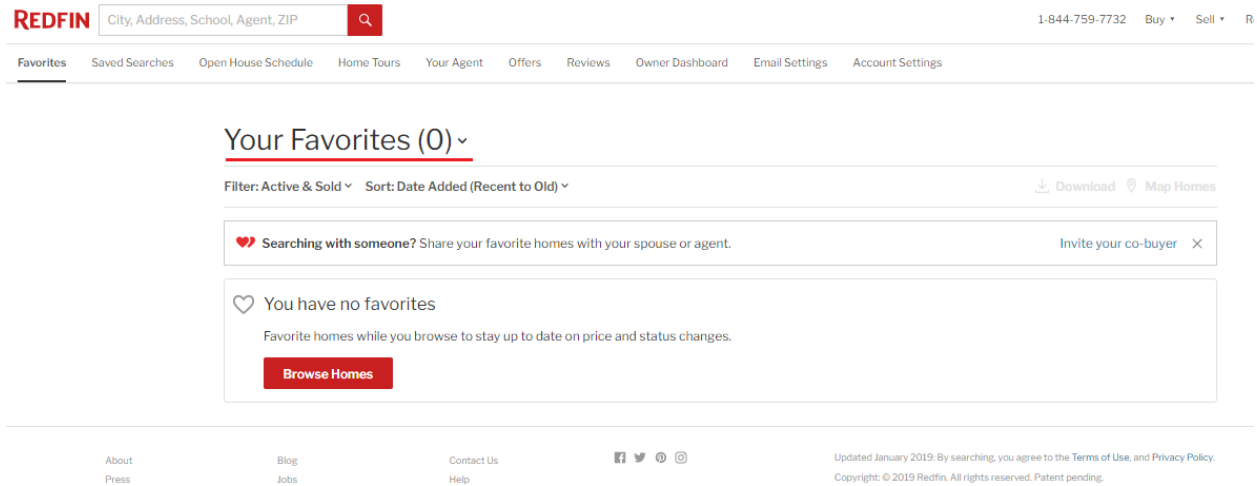
68. On information and belief, the Accused Instrumentality performs the step of storing a user-specific template program (e.g., generic template customized to a user-specific template program based on user-specific interests and with real-time information) for the user in a data structure associated with a user identifier unique to the user (e.g., the user-specific template is stored corresponding to every user based on the user's unique preferences and information associated with the user's sign-in information (e.g., e-mail address)). Upon

information and belief, after a user logs in, redfin.com can display a user's saved/recent searches. As such, a user-specific template program utilized to create the displayed websites that show a user's recent searches must be stored in a database wherein the template program is tied to a user's log in information/account.

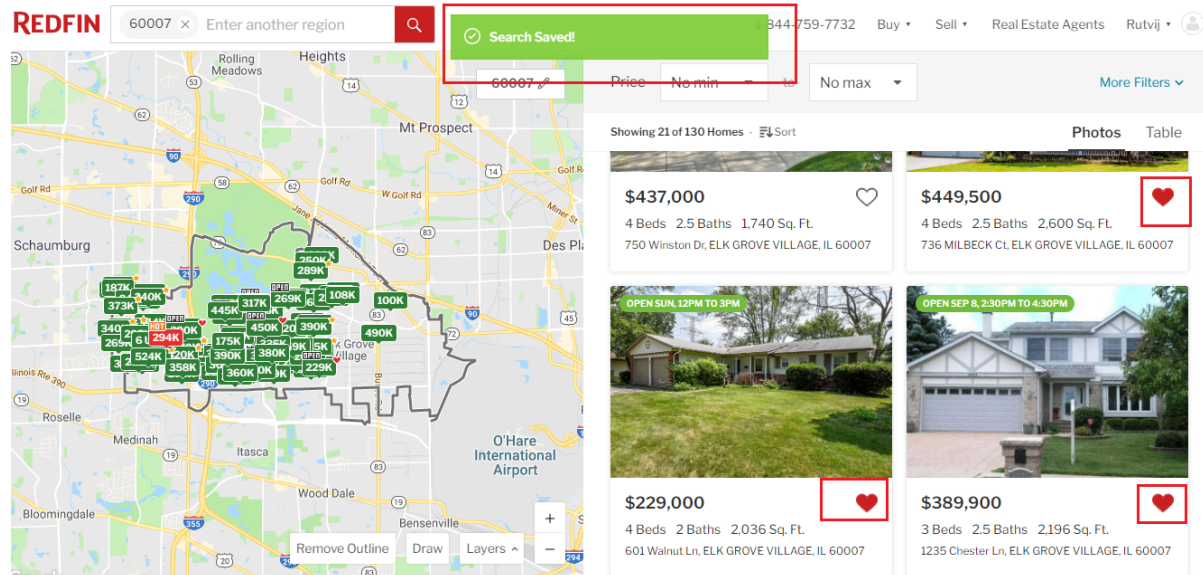


(<https://www.redfin.com/zipcode/60007> (for a particular user)).

69. A user can also customize their redfin.com page by selecting their favorite houses, so that favorite houses can be displayed. Upon information and belief, in order to display the selected property of interest to a user following their login, redfin.com must store the template programs utilized to render the pages in a database, and tie the template programs to a user's account. Below are screenshots pertaining to the selection process:



(<https://www.redfin.com/myredfin/favorites> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)). The following the screenshots of webpages customized according to the favorite houses of two respective users:

First User

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

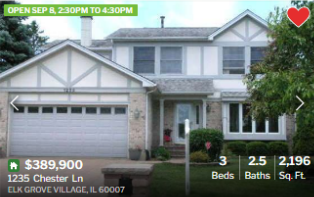
Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer X

OPEN SEP 8 & 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.

Open House: Sun. Sep 8th, 2PM – Add

Schedule Tour

\$/Sq. Ft. \$178

Year Built 1985

On Redfin 24 days


Lot Size 7,936 Sq. Ft.

HOA Dues —

Status Active

Add a comment

OPEN SUN, 12PM TO 3PM



\$112

Year Built 1960

On Redfin 34 days

Lot Size 8,799 Sq. Ft.

HOA Dues —

Status Active

Add a comment

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (7) ▾

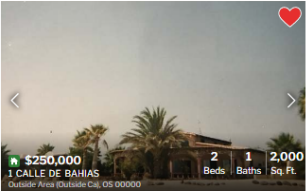
Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer X



\$250,000

1 CALLE DE BAHIAS

Quetzal Area (Baltimor) Cal, 08 00000

2 Beds

1 Baths

2,000 Sq. Ft.

\$/Sq. Ft. \$125

Year Built 1991


On Redfin 729 days

Lot Size 0.28 Acres

HOA Dues —

Status Active

Add a comment



\$173

Year Built 1915

On Redfin 163 days

Lot Size 0.26 Acres

HOA Dues —

Status Active

Add a comment

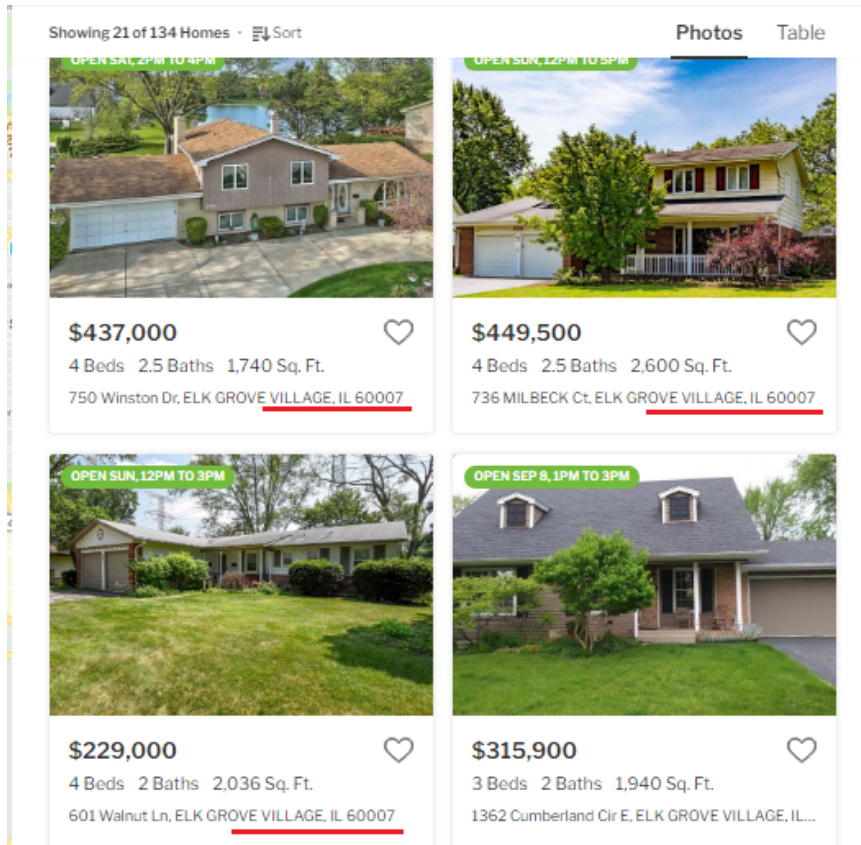
(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

70. Upon information and belief, the Accused Instrumentality performs the step of receiving, from the user and at the page server (e.g., redfin.com server), a user request (e.g., user

login, search initiation, etc.) for a customized page (e.g., search results limited to a user's location, pages with advertisements targeted to a user's interest, etc.) and determining a user identifier associated with the request (e.g., in order to limited search results to a location tied to an account, or nearby house deals related to a user's location, Redfin.com must determine a user identifier that links the request to the user's account and preferences).

The screenshot displays the Redfin website interface. On the left, a map of the 60007 zip code area is shown, with various house icons and price tags (e.g., \$294K, \$373K, \$415K, \$445K, \$317K, \$269K, \$108K, \$100K, \$490K, \$390K, \$380K, \$358K, \$360K, \$175K, \$120K, \$524K, \$264K, \$187K, \$340K). A red box highlights the 60007 zip code on the map. On the right, the '60007 Real Estate' section is visible, featuring a search bar with '60007' entered, a 'Save Search' button, and a 'Price' filter set to 'No min' to 'No max'. Below the search bar, it says 'Showing 21 of 130 Homes'. Two listings are shown: a 'HOT HOME' for \$294,000 (3 Beds, 2 Baths, 1,328 Sq. Ft.) and a listing for \$379,990 (4 Beds, 2 Baths, 1,900 Sq. Ft.). Both listings include photos and open house times.

(<https://www.redfin.com/zipcode/60007> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

71. On information and belief, the Accused Instrumentality performs the step of receiving a template program specific to the user using the determined user identifier (*e.g.*, user id and password) associated with the user request (*e.g.*, user login request). On information and belief, in order to display a webpage that shows search results limited to a user's location and saved/recent searches, Redfin.com must receive a template program (*e.g.*, code, instructions, etc., used to create a webpage for display) tied to a user's account/preferences.

REDFIN 60007 x Enter another region Search 344-759-7732 Buy Sell Real Estate Agents Rutvij

60007 Price No min No max More Filters

Showing 21 of 130 Homes Sort Photos Table

\$437,000
4 Beds 2.5 Baths 1,740 Sq. Ft.
750 Winston Dr, ELK GROVE VILLAGE, IL 60007

\$449,500
4 Beds 2.5 Baths 2,600 Sq. Ft.
736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007

\$229,000
4 Beds 2 Baths 2,036 Sq. Ft.
601 Walnut Ln, ELK GROVE VILLAGE, IL 60007

\$389,900
3 Beds 2.5 Baths 2,196 Sq. Ft.
1235 Chester Ln, ELK GROVE VILLAGE, IL 60007

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

100% FRESH, 100% NATURAL

Schedule Tour

It's free, with no obligation — cancel anytime

Order Now for Home Delivery

Nearby Similar Homes

Homes similar to 920 Ridge Sq #100 are listed between \$90K to \$410K at an average of \$140 per square foot.



\$129,900

1 Bed 1 Bath 900 Sq. Ft.

840 WELLINGTON Ave #112, ELK GROVE VILLA...



\$89,900

1 Bed 1 Bath 900 Sq. Ft.

840 WELLINGTON Ave #212, ELK GROVE VILLA...



\$115,000

2 Beds 1 Bath 1,100 Sq. Ft.

1910 W HATHERLEIGH Ct Unit 1E, MOUNT PROS...

(<https://www.redfin.com/IL/Elk-Grove-Village/920-Ridge-Sq-60007/unit-100/home/18930183>

(for a particular user)).

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

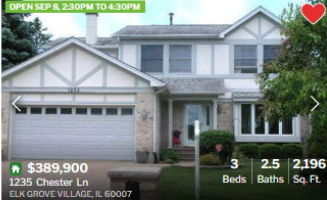
Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.

Open House: Sun. Sep 8th, 2PM – Add

Schedule Tour

\$/Sq. Ft. \$178

Year Built 1985

On Redfin 24 days


Lot Size 7,936 Sq. Ft.

HOA Dues —

Status Active

Add a comment

OPEN SUN, 12PM TO 3PM



\$112

Year Built 1960

On Redfin 34 days

Lot Size 8,799 Sq. Ft.

HOA Dues —

Status Active

Open House: Sun. Sep 1st, 12PM – Add

Schedule Tour

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Fresno County

\$315,000

\$171

99.9%

\$140

\$130

01/18 07/18 01/19 07/19

REDFIN

AUG

AUG


AUG

Schedule Tour

It's free, with no obligation — cancel anytime

Ask a Question (559) 847-0228

grammarly




Instant Grammar Checker

Correct all grammar errors and enhance your writing.

Try Now

Nearby Similar Homes

Homes similar to 1821 Hunter Ave are listed between \$90K to \$980K at an average of \$180 per square foot.



(<https://www.redfin.com/CA/Sanger/1821-Hunter-Ave-93657/home/95985779> (for a particular user)).

48

REDFIN City, Address, School, Agent, ZIP

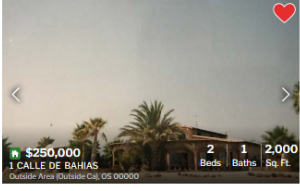
1-844-759-7732 Buy • Sell • Real Estate Agents

Favorites Saved Searches Open House Schedule Home Tours Your Agent Offers Reviews Owner Dashboard Email Settings Account Settings


Your Favorites (7) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ [Download](#) [Map Homes](#)

♥ Searching with someone? Share your favorite homes with your spouse or agent. [Invite your co-buyer](#) X



\$/Sq. Ft.	\$125	Year Built	1991	Schedule Tour
On Redfin	729 days	Lot Size	0.28 Acres	
HOA Dues	—	Status	Active	
Add a comment				



\$/Sq. Ft.	\$173	Year Built	1915	Unavailable to Tour
On Redfin	163 days	Lot Size	0.26 Acres	
HOA Dues	—	Status	Active	
Add a comment				

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

72. On information and belief, the Accused Instrumentality performs the step that the template program is received from one of at least two locations (e.g., main storage at the redfin.com server or local storage on the user's computer), the location determined from frequency of the user request for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available houses and other site logic-based conditions. On information and belief, the template information is stored in multiple locations: (1) at runtime, in a Javascript object with the data structure called Context Data; (2) within browser local storage; and (3) browser cookies.

```
{(0,o.default)(this,e)}return(0,i.default)(e,{key:"handleRoute",value:function(e){return setTimeout(0,0),e()}}),
{key:"getBodyStartContent",value:function(e){var t="<script>".concat(m.getScript().text).concat(y.getScript().text,"</script>");return
e().then(function(e){return e.concat(t)}),[{key:"whenInteractive",value:function(){return R().promise}}]},e)
(),e.exports.getMetricValue=function(e){return(window._RUM||[])[e]},e.exports.getTimeSinceStart=function(){var
e=window.performance&&performance.timing.navigationStart;return e&&new Date-e}},"7AK3":function(e,t,n){"use
strict";Object.defineProperty(t,"_esModule",{value:!0}),t.default=function(){if(!0,i.isBrowser()){return(0,o.default)("localStorage")?function()
{var e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{};t.e.lastUpdate||null;(null===t||(n=t,n<Date.now()-9e5))&&function(){var
e=JSON.parse(localStorage.getItem("RF_PDP_VIEWS"))||{};t=Object.keys(e).map(function(t){return[t,e[t].length]});t.sort(function(e,t){return t[1]-
e[1]});for(var n=[],r=0;r<Math.min(t.length,3)&&!(t[r][1]<3);r+=1)n.push(t[r][0]);if(n.length>0){var o=
{};o.pdp=n,o.lastUpdate=Date.now(),localStorage.setItem("RF_FREQ_VIEW_PDP",JSON.stringify(o))}}();var
n;return(e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{}).pdp||null}():null;return null};var r,o=(r=n("luvc"))&&r._esModule?r:
{default:r,i=n("QP4D")};e.exports=t.default,"7Bly":function(e,t,n){"use strict";var r;Object.defineProperty(t,"_esModule",
{value:!0}),t.default=void 0;var o=(r=n("cuw/"))&&r._esModule?r:(default:r).default;t.default=o,"7GqP":function(e,t,n){"use
strict";e.exports=n("Mwee")},"7NyU":function(e){e.exports=["cache","beacons","customer-pages","mortgage","title","internal-tools","print-
pages","data-endpoints","manage-tour-insights","email-template","legacy","test-pages","performance-test-pages","iframes","error-
pages"]},"7SUW":function(e,t,n){var r=n("tJuQ"),o=n("MMVY"),i=n("Ejil"),a=n("1RMg"),s=n("qv24"),u=n("ZQY0"),l=n("SFv8"),c=
r,n,o,i,a,s,u,l,c}
```

([https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer-
pages/62.d5a57144c6c9ab3b8d4a.bundle.js](https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer-pages/62.d5a57144c6c9ab3b8d4a.bundle.js) (for a particular user)).

```
r=n("A3BI"),o=n("KEY7"),i=n("Zpg7"),a=n("SH7f"),s=n("1uyf"),u={isLoggedIn:function(){var
e=i.getLoginStatusUtilCache();if(!0!==e.isLoggedIn&&1!==e.isLoggedInIn)try{e.isLoggedIn=void 0!==(r("RF_ACCESS_LEVEL"))&&void 0!==(r("RF_AUTH"))}catch(t)
{e.isLoggedIn=1}return e.isLoggedInIn,isLoggedInAnonymously:function(){var
e=i.getLoginStatusUtilCache();if(u.isLoggedInIn())e.isAnonymouslyLoggedIn=1}else
if(!0!==e.isAnonymouslyLoggedIn&&1!==e.isAnonymouslyLoggedInIn)try{e.isAnonymouslyLoggedIn=void 0!==(r("RF_ANON_AUTH"))||void
0!==(r("RF_ANON_SECURE_AUTH"))}catch(t){e.isAnonymouslyLoggedIn=1}return e.isAnonymouslyLoggedIn,cookieAccessLevel:function(){var
e=i.getLoginStatusUtilCache();if(!e.cookieAccessLevel)try{e.cookieAccessLevel=Number(r("RF_ACCESS_LEVEL"))}catch(t){e.cookieAccessLevel=1}return
e.cookieAccessLevel>0&&e.cookieAccessLevel<7?e.cookieAccessLevel:1},accessLevel:function(){return u.isLoggedInIn()?
u.cookieAccessLevel():1},clearCachedValues:function(){i.setLoginStatusUtilCache({});a.isStingray()?
(o.subscribe("onLoginDone",u.clearCachedValues),o.subscribe("onSocialLoginSuccess",u.clearCachedValues),u.clearCachedValues():s.onLoginDone.listen(
u.clearCachedValues),e.exports=u),"8WIM":function(e,t,n){var r=n("cvv2");e.exports=r.default,"8kLS":function(e,t,n){"use
strict";Object.defineProperty(t,"_esModule",{value:!0}),t.default=void 0;var r=i(n("olrQ")),o=i(n("4ppV"));function i(e){return e&&e._esModule?e:
{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return
e&&"function"==typeof Symbol&&e.constructor===Symbol&&!Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var
r=t[n];r.enumerable=r.enumerable||1,r.configurable=10,"value"in r&&r.writable=10,Object.defineProperty(e,r.key,r)}function u(e,t)
{return t||"object"!==(a=t)&&"function"!=typeof t?function(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't
been called");return a}(e):t}:function l(a){return l=Object.setPrototypeOf?function(e){return
```

(*Id.* (for a particular user)).

73. On information and belief, the Accused Instrumentality performs the step of executing the template program (*e.g.*, code, instructions, etc.) specific to the user (*e.g.*, used to create a user-specific web page) using the real-time information (*e.g.*, current house listings, targeted advertisements, targeted advertisements, etc.) stored in the shared local storage device (*e.g.*, current house listings and advertisements are pulled from storage servers/databases and sent to a web/API server used to process the data for display; the web/API server is local to redfin.com and is shared among all users accessing the redfin.com website) to generate the customized page (*e.g.*, a user webpage displaying housing listings, etc., customized for a user based on their preferences). For example, the screenshots in Paragraph 71 are for two different users that have varying current property-related deals displayed based upon the users' respective locations and saved house listing (*i.e.*, real-time information selected for the user's customized

web page based on the customization information unique to the user such as current property listings).

74. On information and belief, the Accused Instrumentality performs the step that the template program indicates items of interest (*e.g.*, house listings related to the user location, advertisements tied to a user's interest, etc.) to the user; and providing the user with the customized page (*e.g.*, user-specific web page). Users have varying current house listings displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current house listings).

75. On information and belief, the Accused Instrumentality performs the step of receiving user preferences (*e.g.*, user location/selected favorite houses, etc.) for the user, wherein the user preferences indicate the items of interest to the user (*e.g.*, house listings near a user, advertisements tied to a user's interest, etc.) and combining the user preferences with a generic template to form the template program specific to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users, however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a generic template that only defines layout and combining the data specific to user's interests to be displayed within the layout. (*E.g.*, screenshots in paragraph 71).

76. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates

Plaintiff for such Defendant's infringement of the '414 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

77. On information and belief, Defendant has had at least constructive notice of the '414 patent by operation of law, and there are no marking requirements that have not been complied with.

VI. COUNT IV
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,565,359)

78. Plaintiff incorporates the above paragraphs herein by reference.

79. On July 21, 2009, United States Patent No. 7,565,359 ("the '359 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '359 Patent is titled "Dynamic Page Generator." A true and correct copy of the '359 Patent is attached hereto as Exhibit K and incorporated herein by reference.

80. Digi Portal is the assignee of all right, title and interest in the '359 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '359 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '359 Patent by Defendant.

81. The application leading to the '359 patent was filed January 22, 2007, as a continuation of application no. 09/393,718, which issued as the '414 patent, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. K at cover). The '359 patent was first assigned to Yahoo! Inc. (*Id.*).

82. The invention in the ‘359 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:22-27).

83. The ‘359 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘359 patent highlights advantages and the unconventional features of the claimed invention. When allowing the claims of the ‘359 patent, the examiner focused on the last two limitations of the claim stating that executing the template program specific to the user using the real-time information stored in the shared local storage device to generate a customized page; and receiving user preferences for the user, and combining the user preferences with a generic template to form the template specific to the user, wherein the user preferences indicate the items of interest to the user in conjunction with the other limitations was not found in the prior art. (Ex. L at 8).

84. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 10 of the ‘359 patent in Delaware, and elsewhere in the United States, by performing actions comprising making and/or using the claimed computer-readable medium comprising instructions for generating customized pages that are customized according to user preferences that performs the method steps required by the claim, including without limitation through the method implemented of providing a user’s redfin.com page (“Accused Instrumentality”). The Accused Instrumentality utilizes a computer-readable medium comprising instructions (*e.g.*, code that is executed to create webpages) for generating customized pages (*e.g.*, user-specific web pages), wherein the customized pages are customized according to user preferences (*e.g.*, web pages will be customized to show house listings near a

user's location, house deals related to a user's location, advertisements targeted to a user's interest, etc.).

85. On information and belief, the Accused Instrumentality performs the step of storing the real-time information in a shared local storage device (*e.g.*, house listings and advertisements will be pulled from a storage server/database and sent to a Redfin.com local web/API server for processing and display). On information and belief, the Accused Instrumentality also performs the step of storing a user-specific template program (*e.g.*, instructions and data used to generate a custom user webpage) for a plurality of users, wherein each template program indicates items of interest to a user (*e.g.*, each user's template program will include instructions, code, etc. that dictates the information that should be displayed for a user based on their interest), and is associated with a user identifier (*e.g.*, in order for a user to see information specific to them and their account, such as recent searches, the template program for their webpage must be tied to their login credentials), wherein the user identifier is associated with a user request (*e.g.*, user login and subsequent search request, navigation, etc.) for a customized page.

86. For example, after a user logs in, redfin.com displays a user's saved/recent search and listings, and therefore a user-specific template program utilized to create the displayed websites that show a user's saved/recent search and listings must be tied to a user's log in information/account.

87. For example, a user can also customize their redfin.com page by selecting their saved favorite houses, so that selected favorite houses can be displayed. In order to display the saved favorite houses to a user following their login, redfin.com must tie the template programs to a user's account.

First User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3)

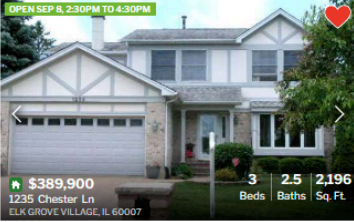
Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3

2.5

2,196

Beds

Baths

Sq. Ft.


Open House: Sun. Sep 8th, 2PM — Add

Schedule Tour

\$/Sq. Ft.	\$178	Year Built	1985
On Redfin	24 days	Lot Size	7,936 Sq. Ft.
HOA Dues	—	Status	Active

Add a comment

OPEN SUN, 12PM TO 3PM



\$112

Open House: Sun. Sep 1st, 12PM — Add

Schedule Tour

\$/Sq. Ft.	\$112	Year Built	1960
On Redfin	34 days	Lot Size	8,799 Sq. Ft.
HOA Dues	—	Status	Active

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

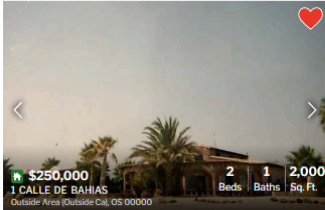
Your Favorites (7)

Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer



\$250,000

1 CALLE DE BAHIAS

Outside Area (Outside Cal, 05 00000

2

1

2,000

Beds

Baths

Sq. Ft.

\$/Sq. Ft.

\$125


Year Built

1991

Schedule Tour

On Redfin	729 days	Lot Size	0.28 Acres
HOA Dues	—	Status	Active

Add a comment



\$173

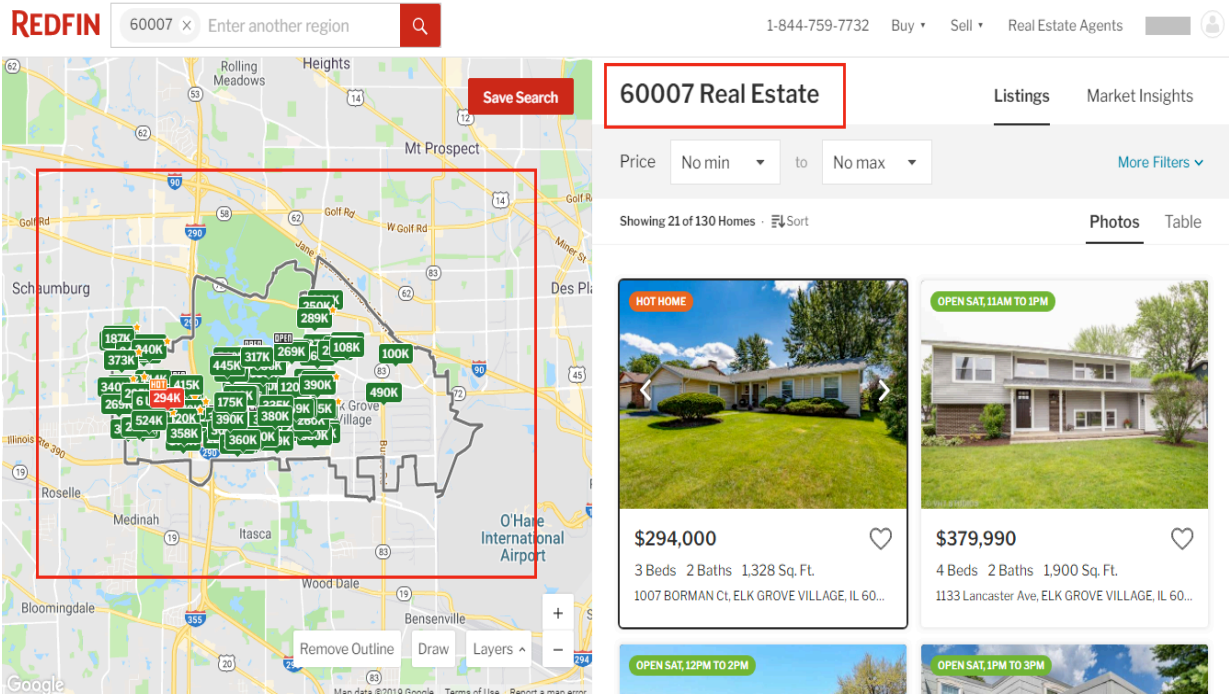
Unavailable to Tour

\$/Sq. Ft.	\$173	Year Built	1915
On Redfin	163 days	Lot Size	0.26 Acres
HOA Dues	—	Status	Active

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

88. For example, a user's redfin.com page will be customized to display current housing deals near their location.

First User:



(<https://www.redfin.com/zipcode/60007> (for a particular user)).


```

r=n("A3BI"),o=n("KEy7"),i=n("ZpgJ"),a=n("SH7f"),s=n("1uyf"),u={isLoggedIn:function(){var
e=i.getLoginStatusUtilCache();if(!0!==e.isLoggedIn&&!1!==e.isLoggedIn)try{e.isLoggedIn=void 0!==(r("RF_ACCESS_LEVEL"))&&void 0!==(r("RF_AUTH"))}catch(t)
{e.isLoggedIn=!1}return e.isLoggedIn},isLoggedInAnonymously:function(){var
e=i.getLoginStatusUtilCache();if(u.isLoggedIn())e.isAnonymouslyLoggedIn=!1;else
if(!0!==e.isAnonymouslyLoggedIn&&!1!==e.isAnonymouslyLoggedIn)try{e.isAnonymouslyLoggedIn=void 0!==(r("RF_ANON_AUTH"))||void
0!==(r("RF_ANON_SECURE_AUTH"))}catch(t){e.isAnonymouslyLoggedIn=!1}return e.isAnonymouslyLoggedIn},cookieAccessLevel:function(){var
e=i.getLoginStatusUtilCache();if(!e.cookieAccessLevel)try{e.cookieAccessLevel=Number(r("RF_ACCESS_LEVEL"))}catch(t){e.cookieAccessLevel=1}return
e.cookieAccessLevel}0&&e.cookieAccessLevel<6?e.cookieAccessLevel:1},accessLevel:function(){return u.isLoggedIn()?
u.cookieAccessLevel():1},clearCachedValues:function(){i.setLoginStatusUtilCache({});a.isStringray()?
(o.subscribe("onLoginDone",u.clearCachedValues),o.subscribe("onSocialLoginSuccess",u.clearCachedValues),u.clearCachedValues):s.onLoginDone.listen(
u.clearCachedValues),e.exports=u},"8WIM":function(e,t,n){var r=n("cvv2");e.exports=r.default},"8kLS":function(e,t,n){use
strict";Object.defineProperty(t,"__esModule",{value:!0}),t.default=void 0;var r=i(n("oLrQ")),o=i(n("4ppV"));function i(e){return e&&e.__esModule?e:
{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return
e&&"function"==typeof Symbol&&e.constructor===Symbol&&e===Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var
r=t[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value"in r&&(r.writable=!0),Object.defineProperty(e,r.key,r)}}function u(e,t)
{return t||{"object"!==(a(t)&&"function"!=typeof t)?function(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't
been called");return e}(t):t}:function l(e){return(l=Object.setPrototypeOf?Object.getPrototypeOf:function(e){return

```

(Id. (for a particular user)).

90. On information and belief, the Accused Instrumentality performs the step of receiving a template program (e.g., code, instructions, etc. that are executed to create a user page) specific to the user using the user identifier (e.g., as explained above, in order to display pages customized for a user subsequent to their login, the template program used to create the customized page must be tied to the user's account credentials), wherein the template program is received from one of at least two locations (e.g., main storage at a redfin.com server or local device storage), the location based upon a frequency of user requests for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage server wherein frequently accessed files will be stored in local storage on the user's computer. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available housing listings, and other site logic-based conditions. The template information can be stored in multiple locations including but not limited to (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

91. On information and belief, the Accused Instrumentality performs that step of executing the template program specific to the user (e.g., generating user-specific web page by

executing a template program which is composed of code, instructions, and data) using the real-time information stored in the shared local storage device (*e.g.*, housing listings and advertisements pulled from external storage servers/databases and sent to a local redfin.com web/API server for processing and display) to generate the customized page. As shown above, a user's redfin.com page will be customized to show current housing deals near the location linked to a user's account.

92. On information and belief, the Accused Instrumentality performs the step of receiving user preferences for the user (*e.g.*, user location, favorite houses, past searches, etc.), and for combining the user preferences with a generic template to form the template program specific to the user (*e.g.*, user-specific web page), wherein the user preferences indicate the items of interest to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and adding the data to be displayed within the layout. For example, the following screenshots of two different users that have varying current housing deals displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current housing deals) shows that the template program is varied so that each user can receive appropriately customized pages (*e.g.*, the code for each respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user).

First User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732Buy • Sell • Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (3) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

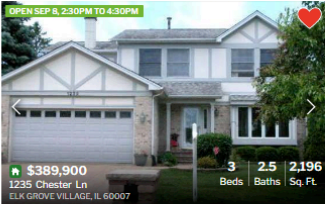
Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer ×

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.

Open House: Sun. Sep 8th, 2PM — Add

Schedule Tour

\$/Sq. Ft. \$178

Year Built 1985

On Redfin 24 days


Lot Size 7,936 Sq. Ft.

HOA Dues —

Status Active

Add a comment

OPEN SUN, 12PM TO 3PM



Open House: Sun. Sep 1st, 12PM — Add

Schedule Tour

\$/Sq. Ft. \$112

Year Built 1960

On Redfin 34 days

Lot Size 8,799 Sq. Ft.

HOA Dues —

Status Active

Add a comment

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732Buy • Sell • Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (7) ▾

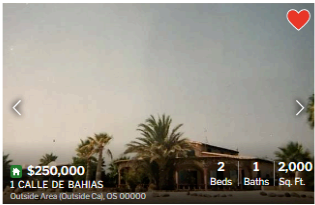
Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer ×



\$250,000

1 CALLE DE BAHIAS

Quitaric Arica (Quitaric Chil, Chile) 000000

2 Beds

1 Bath

2,000 Sq. Ft.

\$/Sq. Ft. \$125

Year Built 1991

On Redfin 729 days


Lot Size 0.28 Acres

HOA Dues —

Status Active

Add a comment

Schedule Tour



Unavailable to Tour

\$/Sq. Ft. \$173

Year Built 1915

On Redfin 163 days

Lot Size 0.26 Acres

HOA Dues —

Status Active

Add a comment

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

61

93. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '359 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

94. On information and belief, Defendant has had at least constructive notice of the '359 patent by operation of law, and there are no marking requirements that have not been complied with.

VII. COUNT V
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,626,342)

95. Plaintiff incorporates the above paragraphs herein by reference.

96. On April 18, 2017, United States Patent No. 9,626,342 ("the '342 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '342 Patent is titled "Dynamic Page Generator." The '342 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 891 days. (Ex. M). A true and correct copy of the '342 Patent is attached hereto as Exhibit M and incorporated herein by reference.

97. Digi Portal is the assignee of all right, title and interest in the '342 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '342 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '342 Patent by Defendant.

98. The application leading to the '342 patent was filed December 21, 2012, as a continuation of application no. 11/842,095, which was a continuation of application no.

11/656,636, which is a continuation of 09/393,718, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. M at cover).

99. The invention in the '342 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:33-37).

100. The '342 Patent shares the identical specification as the '854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25.

101. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 7 of the '342 patent in Delaware, and elsewhere in the United States, by performing actions comprising performing the claimed method steps, including without limitation through the method implemented of providing a user's redfin.com page ("Accused Instrumentality"). The Accused Instrumentality practices the method of responding to a user request (*e.g.*, a user login request, search initiation, etc.) for a customized page (*e.g.*, a user's customized home and search pages on the redfin.com website). (*E.g.*, <https://www.redfin.com>).

102. On information and belief, the Accused Instrumentality performs the step of generating, via at least one server computer (*e.g.*, redfin.com server), a template program unique to the user (*e.g.*, a template program will be unique to a user because it is composed of instruction, code, and data that is processed/executed to create a webpage customized to a user), the template program that is unique to the user being used to form the user's customized web page, the template program that is unique to the user being generated using customization information unique to the user (*e.g.*, user location, past searches) and a global template that is generic to a plurality of users. On information and belief, the Accused Instrumentality uses a

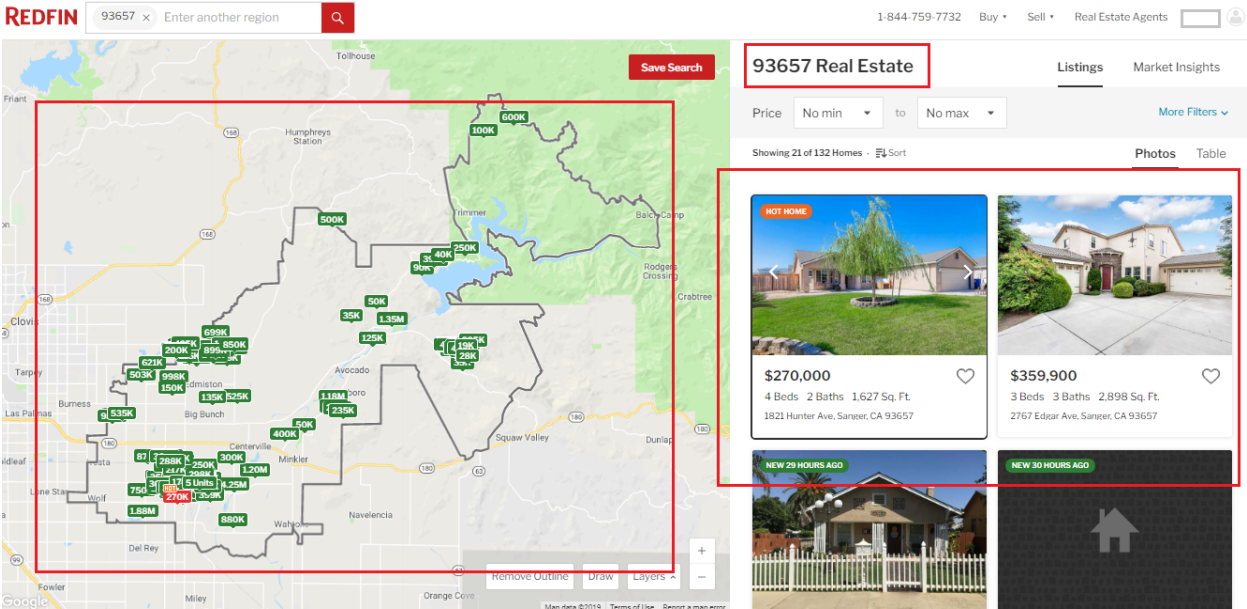
template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and combining the data selected based on customization information unique to the user to be displayed within the layout. For example, the following screenshots for two different users have varying current house deals displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current house deals near a particular location).

First User:

The screenshot displays the Redfin website interface for the 60007 zip code. On the left, a map shows the geographic area with various house price markers (e.g., \$187K, \$240K, \$373K, \$415K, \$445K, \$317K, \$269K, \$289K, \$108K, \$100K, \$490K, \$390K, \$380K, \$390K, \$35K, \$360K, \$358K, \$524K, \$269K, \$340K, \$294K). A red box highlights a specific area on the map. On the right, the '60007 Real Estate' section is visible, featuring a search bar with 'Price' and 'No min' to 'No max' filters, and a 'More Filters' link. Below the search bar, it says 'Showing 21 of 130 Homes'. Two property listings are shown: a 'HOT HOME' for \$294,000 (3 Beds, 2 Baths, 1,328 Sq. Ft.) and another for \$379,990 (4 Beds, 2 Baths, 1,900 Sq. Ft.). Both listings include photos and open house times.

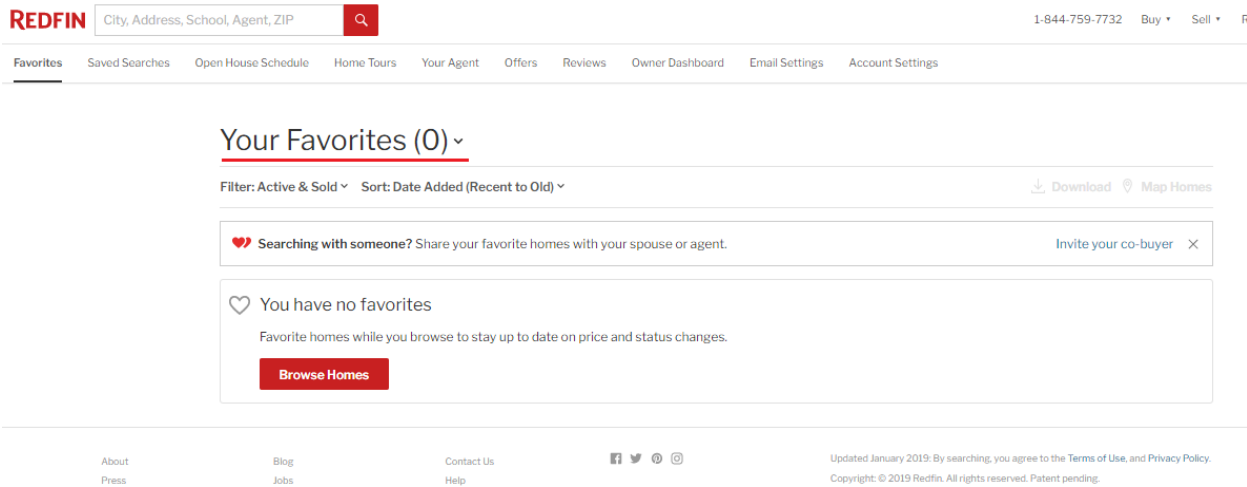
(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Second User:

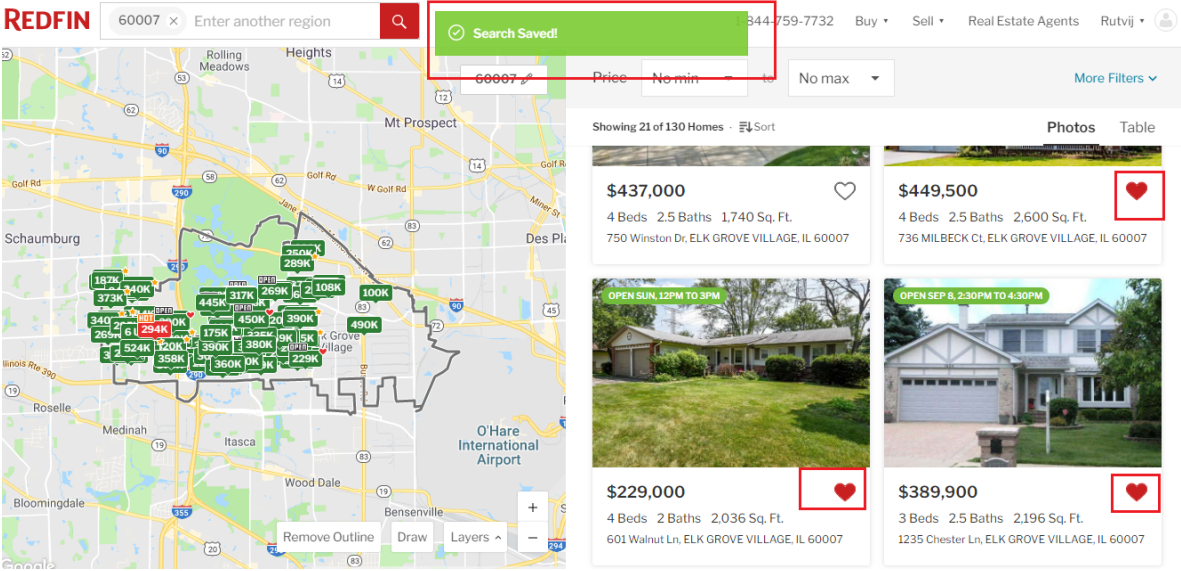


(<https://www.redfin.com/zipcode/93657> (for a particular user)).

103. For example, a user can also customize their redfin.com page by selecting their favorite houses, so that favorite houses can be displayed.

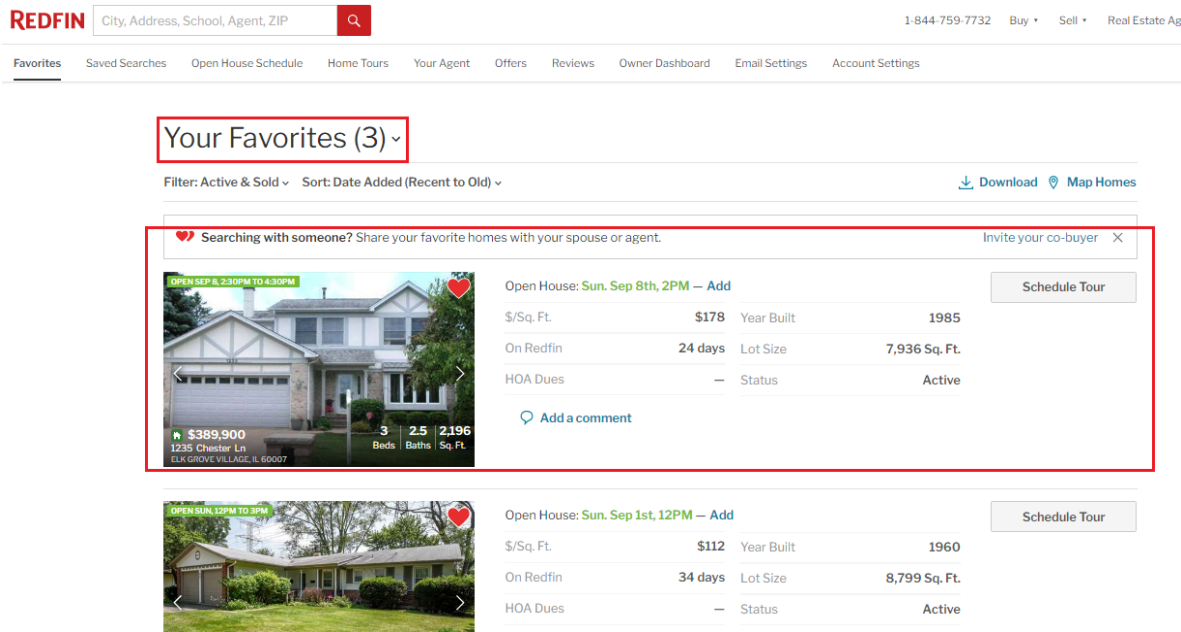


(<https://www.redfin.com/myredfin/favorites> (for a particular user)).



(<https://www.redfin.com/zipcode/60007> (for a particular user)).

First User:



(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

Your Favorites (7) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾

Download

Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent.

Invite your co-buyer ×

\$250,000

1 CALLE DE BAHIAS

Outside Area (Outside Cal. 05 00000)

2 Beds

1 Bath

2,000 Sq. Ft.

\$/Sq. Ft.

\$125

Year Built

1991

On Redfin

729 days

Lot Size

0.28 Acres

HOA Dues

—

Status

Active

Add a comment

Schedule Tour

Unavailable to Tour

\$/Sq. Ft.

\$173

Year Built

1915

On Redfin

163 days

Lot Size

0.26 Acres

HOA Dues

—

Status

Active

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

104. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (*e.g.*, redfin.com server), the user's template program (*e.g.*, instructions, code and data used to create a user webpage) to generate the user's customized web page, the user's customized web page including real-time information (*e.g.*, current house listings, advertisements) selected for the user's customized web page based on the customization information unique to the user (*e.g.*, user location, saved housing). For example, a user's redfin.com page will be customized to show current house listings near the location linked to a user's account.

First User:

The screenshot shows the Redfin website interface for a search in zip code 60007. A red box highlights the search bar containing '60007' and a green box highlights a 'Search Saved!' notification. The map on the left shows the Elk Grove Village area with various price points labeled. The right side displays a grid of four property listings, each with a heart icon in a red box. The listings are:

- \$437,000: 4 Beds, 2.5 Baths, 1,740 Sq. Ft., 750 Winston Dr, ELK GROVE VILLAGE, IL 60007
- \$449,500: 4 Beds, 2.5 Baths, 2,600 Sq. Ft., 736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007
- \$229,000: 4 Beds, 2 Baths, 2,036 Sq. Ft., 601 Walnut Ln, ELK GROVE VILLAGE, IL 60007
- \$389,900: 3 Beds, 2.5 Baths, 2,196 Sq. Ft., 1235 Chester Ln, ELK GROVE VILLAGE, IL 60007

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Second User:

The screenshot shows the Redfin website interface for a search in zip code 93657. A red box highlights the search bar containing '93657' and a red box highlights a 'Save Search' button. The map on the left shows the Sanger area with various price points labeled. The right side displays a grid of four property listings, each with a heart icon in a red box. The listings are:

- \$270,000: 4 Beds, 2 Baths, 1,627 Sq. Ft., 1821 Hunter Ave, Sanger, CA 93657
- \$359,900: 3 Beds, 3 Baths, 2,898 Sq. Ft., 2767 Edgar Ave, Sanger, CA 93657
- NEW 29 HOURS AGO: 4 Beds, 2 Baths, 1,627 Sq. Ft., 1821 Hunter Ave, Sanger, CA 93657
- NEW 30 HOURS AGO: 3 Beds, 3 Baths, 2,898 Sq. Ft., 2767 Edgar Ave, Sanger, CA 93657

(<https://www.redfin.com/zipcode/93657> (for a particular user)).

105. For example, a user can also customize their redfin.com page by selecting their favorite houses, so that selected favorite houses can be displayed.

First User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Ag

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings

Account Settings

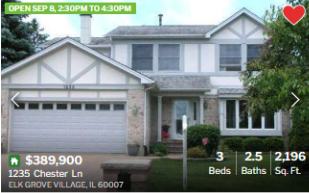
Your Favorites (3)

Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent. Invite your co-buyer

OPEN SEP 8, 2:30PM TO 4:30PM



\$389,900

1235 Chester Ln

ELK GROVE VILLAGE, IL 60007

3 Beds

2.5 Baths

2,196 Sq. Ft.

Open House: Sun. Sep 8th, 2PM — Add

Schedule Tour

\$/Sq. Ft. \$178

Year Built 1985

On Redfin 24 days


Lot Size 7,936 Sq. Ft.

HOA Dues —

Status Active

Add a comment

OPEN SUN 12PM TO 3PM



\$112

Year Built 1960

On Redfin 34 days

Lot Size 8,799 Sq. Ft.

HOA Dues —

Status Active

Schedule Tour

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN

City, Address, School, Agent, ZIP

1-844-759-7732

Buy

Sell

Real Estate Agents

Favorites

Saved Searches

Open House Schedule

Home Tours

Your Agent

Offers

Reviews

Owner Dashboard

Email Settings


Account Settings

Your Favorites (7)

Filter: Active & Sold Sort: Date Added (Recent to Old)

Download Map Homes

Searching with someone? Share your favorite homes with your spouse or agent. Invite your co-buyer



\$250,000

1 CALLE DE BAHIAS

Outlier Area (Outlier) CA 95000

2 Beds

1 Bath

2,000 Sq. Ft.

\$/Sq. Ft. \$125

Year Built 1991

On Redfin 729 days


Lot Size 0.28 Acres

HOA Dues —

Status Active

Add a comment

Schedule Tour



\$173

Year Built 1915

On Redfin 163 days

Lot Size 0.26 Acres

HOA Dues —

Status Active

Unavailable to Tour

69

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

106. On information and belief, the Accused Instrumentality performs the step of in response to receiving a subsequent request for the user's customized web page (e.g., user login); receiving, via the at least one server computer (redfin.com server), the template program that is unique to the user from one of at least two locations (e.g., main storage at a redfin.com server or local storage on the user's device), the location determined from the frequency of the request for the user's customized web page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage wherein frequently accessed files will be stored in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available housing listings and other site logic-based conditions. On information and belief, the template information can be stored in multiple locations: (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
{(0,o.default)(this,e)}return(0,i.default)(e,[{key:"handleRoute",value:function(e){return setTimeout(0,0),e()}}],{key:"getBodyStartContent",value:function(e){var t="<script>".concat(m.getScript().text).concat(y.getScript().text,"</script>");return e().then(function(e){return e.concat(t)}}}),[{key:"whenInteractive",value:function(){return R().promise}}],e)(),e.exports.getMetricValue=function(e){return(window._RUM||{})[e]},e.exports.getTimeSinceStart=function(){var e=window.performance&&performance.timing.navigationStart;return e&&new Date-e}},{"7AK3":function(e,t,n){var strict:Object.defineProperty(t,"__esModule",{value:!0});t.default=function(){if(!0,i.isBrowser())return(0,o.default)("localStorage")?function(){var e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{};t=e.last_update||null;(null==t||n=t,n<Date.now()-9e5)&&function(){var e=JSON.parse(localStorage.getItem("RF_PDP_VIEWS"))||{};t=Object.keys(e).map(function(t){return[t,e[t].length]});t.sort(function(e,t){return t[1]-e[1]});for(var n=[],r=0;r<Math.min(t.length,3)&&!t[r][1]<3;r+=1)n.push(t[r][0]);if(n.length>0){var o={};o.pdp=n,o.last_update=Date.now(),localStorage.setItem("RF_FREQ_VIEW_PDP",JSON.stringify(o))}}();var n;return(e=JSON.parse(localStorage.getItem("RF_FREQ_VIEW_PDP"))||{}).pdp||null}():null;return null};var r,o=(r=n("luvc"))&&r.__esModule?r:{default:r},i=n("QP4D");e.exports=t.default},{"7Bly":function(e,t,n){var r;Object.defineProperty(t,"__esModule",{value:!0});t.default=void 0;var o=((r=n("cuw/"))&&r.__esModule?r:{default:r}).default;t.default=o},{"7GqP":function(e,t,n){var strict;e.exports=n("Mwee")},{"7NyU":function(e){e.exports=["cache","beacons","customer-pages","mortgage","title","internal-tools","print-pages","data-endpoints","manage-tour-insights","email-template","legacy","test-pages","performance-test-pages","iframes","error-pages"]},{"7SUW":function(e,t,n){var r=n("tJuQ"),o=n("MWVY"),i=n("Ej1l"),a=n("1RMg"),s=n("qv24"),u=n("ZQY0"),l=n("SFv8"),c=
```

(<https://ssl.cdn-Redfin.com/vLATEST/corvstatic/customer-pages/62.d5a57144c6c9ab3b8d4a.bundle.js> (for a particular user)).

```

r=n("A3BI"),o=n("KEy7"),i=n("ZpgJ"),a=n("SH7f"),s=n("Iuyf"),u={isLoggedIn:function(){var
e=i.getLoginStatusUtilCache();if(!0!==e.isLoggedIn&&!1!==e.isLoggedIn)try{e.isLoggedIn=void 0!==(r("RF_ACCESS_LEVEL")&&void 0!==(r("RF_AUTH")))}catch(t)
{e.isLoggedIn=!1}return e.isLoggedIn},isLoggedInAnonymously:function(){var
e=i.getLoginStatusUtilCache();if(u.isLoggedIn())e.isAnonymouslyLoggedIn=!1;else
if(!0!==e.isAnonymouslyLoggedIn&&!1!==e.isAnonymouslyLoggedIn)try{e.isAnonymouslyLoggedIn=void 0!==(r("RF_ANON_AUTH"))||void
0!==(r("RF_ANON_SECURE_AUTH"))}catch(t){e.isAnonymouslyLoggedIn=!1}return e.isAnonymouslyLoggedIn},cookieAccessLevel:function(){var
e=i.getLoginStatusUtilCache();if(!e.cookieAccessLevel)try{e.cookieAccessLevel=Number(r("RF_ACCESS_LEVEL"))}catch(t){e.cookieAccessLevel=1}return
e.cookieAccessLevel}&&e.cookieAccessLevel<6?e.cookieAccessLevel:1},accessLevel:function(){return u.isLoggedIn()?(
u.cookieAccessLevel():1),clearCachedValues:function(){i.setLoginStatusUtilCache({});s.isStingray()?
(o.subscribe("onLoginDone",u.clearCachedValues),o.subscribe("onSocialLoginSuccess",u.clearCachedValues),u.clearCachedValues):s.onLoginDone.listen(
u.clearCachedValues),e.exports=u},"8WIM":function(e,t,n){var r=n("cyy2");e.exports=r.default},"8kLS":function(e,t,n){/"use
strict";Object.defineProperty(t,"__esModule",{value:!0}),t.default=void 0;var r=i(n("olrQ")),o=i(n("4ppV"));function i(e){return e&&e.__esModule?e:
{default:e}}function a(e){return(a="function"==typeof Symbol&&"symbol"==typeof Symbol.iterator?function(e){return typeof e}:function(e){return
e&&"function"==typeof Symbol&&e.constructor===Symbol&&e===Symbol.prototype?"symbol":typeof e})(e)}function s(e,t){for(var n=0;n<t.length;n++){var
r=t[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value"in r&&(r.writable=!0),Object.defineProperty(e,r.key,r)}}function u(e,t)
{return!t||"object"!==a(t)&&"function"!==typeof t?function(e){if(void 0===e)throw new ReferenceError("this hasn't been initialised - super() hasn't
been called");return e}(a).t+function l(a){return l=Object.getPrototypeOf?Object.getPrototypeOf:function(e){return

```

(Id. (for a particular user)).

107. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (e.g., redfin.com server), the received template program that is unique to the user (e.g., instructions, code, and data that is executed to create a customized user webpage) to generate the user's customized web page, the user's customized web page including real-time information (e.g., current house listings, advertisements) selected for the user's customized web page in response to the subsequent request (e.g., user login, search initiation, etc.) and based on the customization information unique to the user (e.g., user location, saved property).


The screenshot displays the Redfin website interface. At the top, the Redfin logo is on the left, and navigation links for 'Buy', 'Sell', and 'Real Estate Agents' are on the right. A search bar contains the zip code '60007'. Below the search bar, a map of the Chicago area is shown, with a red outline highlighting the 60007 zip code. To the right of the map, the heading '60007 Real Estate' is displayed, followed by filters for 'Price' (No min to No max) and 'More Filters'. Below the filters, it says 'Showing 21 of 130 Homes'. Two real estate listings are visible: a 'HOT HOME' for \$294,000 (3 Beds, 2 Baths, 1,328 Sq. Ft.) and another for \$379,990 (4 Beds, 2 Baths, 1,900 Sq. Ft.).

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Showing 21 of 134 Homes · Sort

Photos Table

OPEN SAT, 2PM TO 4PM




\$437,000

4 Beds 2.5 Baths 1,740 Sq. Ft.

750 Winston Dr, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 5PM




\$449,500

4 Beds 2.5 Baths 2,600 Sq. Ft.

736 MILBECK Ct, ELK GROVE VILLAGE, IL 60007

OPEN SUN, 12PM TO 3PM




\$229,000

4 Beds 2 Baths 2,036 Sq. Ft.

601 Walnut Ln, ELK GROVE VILLAGE, IL 60007

OPEN SEP 8, 1PM TO 3PM



\$315,900

3 Beds 2 Baths 1,940 Sq. Ft.

1362 Cumberland Cir E, ELK GROVE VILLAGE, IL...

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

108. For example, a user’s redfin.com page will also be customized to show current housing deals near the location linked to a user’s account.

First User

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

Second User:

(<https://www.redfin.com/zipcode/93657> (for a particular user)).

109. For example, a user can also customize their redfin.com page by selecting their favorite houses, so that selected favorite houses can be displayed.

REDFIN City, Address, School, Agent, ZIP 1-844-759-7732 Buy Sell R

Favorites Saved Searches Open House Schedule Home Tours Your Agent Offers Reviews Owner Dashboard Email Settings Account Settings

Your Favorites (0) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ Download Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent. Invite your co-buyer ×

♥ You have no favorites

Favorite homes while you browse to stay up to date on price and status changes.

Browse Homes

About Press Blog Jobs Contact Us Help f t i n Updated January 2019: By searching, you agree to the [Terms of Use](#), and [Privacy Policy](#). Copyright: © 2019 Redfin. All rights reserved. Patent pending.

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

First User:

REDFIN 60007 x Enter another region Search Saved! 1-844-759-7732 Buy Sell Real Estate Agents Rutvij

60007 Price No min No max More Filters ▾

Showing 21 of 130 Homes · Sort

Price	Beds	Baths	Sq. Ft.	Address	City	State	Zip
\$437,000	4	2.5	1,740	750 Winston Dr.	ELK GROVE VILLAGE	IL	60007
\$449,500	4	2.5	2,600	736 MILBECK Ct.	ELK GROVE VILLAGE	IL	60007
\$229,000	4	2	2,036	601 Walnut Ln.	ELK GROVE VILLAGE	IL	60007
\$389,900	3	2.5	2,196	1235 Chester Ln.	ELK GROVE VILLAGE	IL	60007

(<https://www.redfin.com/zipcode/60007> (for a particular user)).

REDFIN City, Address, School, Agent, ZIP

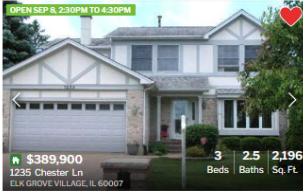
1-844-759-7732 Buy • Sell • Real Estate Ag

[Favorites](#)
[Saved Searches](#)
[Open House Schedule](#)
[Home Tours](#)
[Your Agent](#)
[Offers](#)
[Reviews](#)
[Owner Dashboard](#)
[Email Settings](#)
[Account Settings](#)

Your Favorites (3) ▾

Filter: Active & Sold ▾ Sort: Date Added (Recent to Old) ▾ [Download](#) [Map Homes](#)


♥ Searching with someone? Share your favorite homes with your spouse or agent. [Invite your co-buyer](#) ×



Open House: **Sun. Sep 8th, 2PM** — [Add](#) [Schedule Tour](#)

\$/Sq. Ft.	\$178	Year Built	1985
On Redfin	24 days	Lot Size	7,936 Sq. Ft.
HOA Dues	—	Status	Active

[Add a comment](#)



Open House: **Sun. Sep 1st, 12PM** — [Add](#) [Schedule Tour](#)

\$/Sq. Ft.	\$112	Year Built	1960
On Redfin	34 days	Lot Size	8,799 Sq. Ft.
HOA Dues	—	Status	Active

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

Second User:

REDFIN 93657 × Enter another region

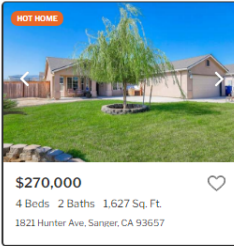
1-844-759-7732 Buy • Sell • Real Estate Agents

93657 Real Estate

[Listings](#)
[Market Insights](#)

Price No min ▾ to No max ▾ [More Filters](#) ▾


Showing 21 of 132 Homes ▾ Sort [Photos](#) [Table](#)



\$270,000

4 Beds 2 Baths 1,627 Sq. Ft.

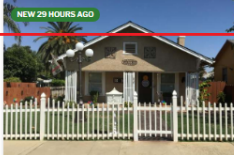
1821 Hunter Ave, Sanger, CA 93657



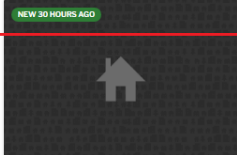
\$359,900

3 Beds 3 Baths 2,898 Sq. Ft.

2767 Edgar Ave, Sanger, CA 93657



NEW 29 HOURS AGO



NEW 30 HOURS AGO

(<https://www.redfin.com/zipcode/93657> (for a particular user)).

REDFIN City, Address, School, Agent, ZIP

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Your Favorites (7) ~

Filter: Active & Sold Sort: Date Added (Recent to Old) Download Map Homes

♥ Searching with someone? Share your favorite homes with your spouse or agent. Invite your co-buyer X

\$/Sq. Ft.	\$125	Year Built	1991	Schedule Tour
On Redfin	729 days	Lot Size	0.28 Acres	
HOA Dues	—	Status	Active	
Add a comment				

\$/Sq. Ft.	\$173	Year Built	1915	Unavailable to Tour
On Redfin	163 days	Lot Size	0.26 Acres	
HOA Dues	—	Status	Active	

(<https://www.redfin.com/myredfin/favorites> (for a particular user)).

110. On information and belief, the Accused Instrumentality performs the step of serving, via the at least one server computer (*e.g.*, redfin.com server), the user's customized web page (*e.g.*, webpage customized for a user with current house listings, and customized advertisements). (*E.g.*, screenshots in paragraph 109).

111. On information and belief, the Accused Instrumentality performs the step of providing a customized page to the user (*e.g.*, a user's redfin.com page with integrated advertisements) wherein the user template comprises advertisement selection information for use in selecting one or more advertisements for inclusion in the user's customized web page in addition to real-time information selected for the user's web page (*e.g.*, the code for the webpage will include code that allows for the insertion of target advertisements into a user's customized web page which contains real time information such as current housing listings).


First User:

27
AUG

30
AUG

31
AUG

100% FRESH, 100% NATURAL



www.f...

Order Now for Home Delivery

Schedule Tour

It's free, with no obligation — cancel anytime

Nearby Similar Homes

Homes similar to 920 Ridge Sq #100 are listed between \$90K to \$410K at an average of \$140 per square foot.



\$129,900

1 Bed 1 Bath 900 Sq. Ft.

840 WELLINGTON Ave #112, ELK GROVE VILLA...



\$89,900

1 Bed 1 Bath 900 Sq. Ft.

840 WELLINGTON Ave #212, ELK GROVE VILLA...



\$115,000

2 Beds 1 Bath 1100 Sq. Ft.

1910 W HATHERLEIGH Ct Unit 1E, MOUNT PROS...

(<https://www.redfin.com/IL/Elk-Grove-Village/920-Ridge-Sq-60007/unit-100/home/18930183>

(for a particular user)).

Second User:

Fresno County

\$315,000

\$171

99.9%

\$140

\$130

01/18 07/18 01/19 07/19

REDFIN


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Ask a Question

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Nearby Similar Homes

Homes similar to 1821 Hunter Ave are listed between \$90K to \$980K at an average of \$180 per square foot.



(<https://www.redfin.com/CA/Sanger/1821-Hunter-Ave-93657/home/95985779> (for a particular user)).

112. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '342 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

113. On information and belief, Defendant has had at least constructive notice of the '342 patent by operation of law, and there are no marking requirements that have not been complied with.

VIII. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 8,352,854 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 5,983,227 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that one or more claims of United States Patent No. 7,171,414 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;

- d. Judgment that one or more claims of United States Patent No. 7,565,359 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- e. Judgment that one or more claims of United States Patent No. 9,626,342 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- f. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- g. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- h. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

September 22, 2019

STAMOULIS & WEINBLATT LLC

OF COUNSEL:

David R. Bennett
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
(312) 291-1667
dbennett@directionip.com

/s/ Stamatios Stamoulis
Stamatios Stamoulis (No. 4606)
800 N. West Street, Third Floor
Wilmington, DE 19809
(302) 999-1540
stamoulis@swdelaw.com

Attorneys for Plaintiff Digi Portal LLC